



IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

OCT 27 2022

RICK WARREN  
COURT CLERK

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JEREMY ROWAN and  
MELINDA ROWAN, husband and wife,

Plaintiffs,

vs.

STATE FARM FIRE & CASUALTY  
COMPANY,

Defendant.

Case No. CJ-2017-7301

*The Honorable Don Andrews*

**PLAINTIFFS' MOTION FOR ATTORNEY FEES AND COSTS  
AND BRIEF IN SUPPORT**

Pursuant to 36 O.S. § 3629(B), 12 O.S. §§ 696.4, 928, 940(A), and 942, Plaintiffs Jeremy and Melinda Rowan ("Plaintiffs"), as the prevailing party, move this Court for an award of attorney fees, costs and interest against Defendant State Farm Fire & Casualty Company ("Defendant").

**INTRODUCTION**

On December 28, 2017, Plaintiffs filed their lawsuit against Defendant in the District Court of Oklahoma County to recover damages for Defendant's failure to fully compensate Plaintiffs for the storm damages to their home that occurred on April 29, 2017. Plaintiffs tenaciously litigated their claims of breach of contract and bad faith for nearly five years. On September 1, 2022, after a four-day jury trial, the jury unanimously awarded Plaintiffs \$70,400.00 for their breach of contract claim and \$680,000.00 for their bad faith claim; the total verdict being \$750,400.00. Thus, without question, Plaintiffs are entitled to attorney fees and interest under 36 O.S. § 3629(B) and costs under 12 O.S. §§ 928, 940(A), and 942.

**EXHIBIT**

6

## ARGUMENT AND AUTHORITIES

### I. PLAINTIFFS ARE THE PREVAILING PARTY.

There can be but one prevailing party in an action at law for the recovery of a money judgment. *Quapaw Co. v. Varnell*, 1977 OK CIV APP 19, 566 P.2d 164, 167; *The Company, Inc. v. Trion Energy*, 1988 OK 82, 761 P.2d 470, 471 (“[T]here can be only one prevailing party.”); *Rambo v. Hicks*, 1986 OK 86, 733 P.2d 405. The “prevailing party” is the party who has an affirmative judgment rendered in his favor at the conclusion of the entire case. *The Company, Inc.*, 761 P.2d at 471-72; *Smith v. Jenkins*, 1994 OK 43, 873 P.2d 1044, 1047; *Underwriters at Lloyd’s of London v. N. Am. Van Lines*, 1992 OK 48, 829 P.2d 978, 981. On September 27, 2022, this Court memorialized its Judgment for Plaintiffs for breach of contract and bad faith. Defendant obtained no relief from the jury or Court. Accordingly, Plaintiffs are the prevailing party.

### II. PLAINTIFFS ARE ENTITLED TO AN AWARD OF ATTORNEY FEES.

Under 12 O.S. § 3629(B), attorney fees are recoverable by the prevailing party in an action over insurance benefits. *See First Nat’l Bank of Turley v. Fid. & Deposit Ins. Co. of Md.*, 196 F.3d 1186, 1188-89 (10th Cir. 1999); *McCorkle v. Great Atl. Ins. Co.*, 1981 OK 128, 637 P.2d 583, 586. Section 3629(B) provides in pertinent part:

B. It shall be the duty of the insurer, receiving a proof of loss, to submit a written offer of settlement or rejection of the claim to the insured within sixty (60) days of receipt of that proof of loss. Upon a judgment rendered to either party, costs and attorney fees shall be allowable to the prevailing party. For purposes of this section, the prevailing party is the insurer in those cases where judgment does not exceed written offer of settlement. In all other judgments the insured shall be the prevailing party....

36 O.S. § 3629(B) (emphasis added). *See also Taylor v. State Farm Fire & Cas. Co.*, 1999 OK 44, 981 P.2d 1253 (“Section 3629 provides, among others, for the prevailing party’s recovery of counsel fee in an action for the insured loss recovery.”); *Shinault v. Mid-Century Ins. Co.*,

1982 OK 136, 654 P.2d 618; *Shadoan v. Liberty Mut. Fire Ins. Co.*, 1994 OK CIV APP 182, 894 P.2d 1140, 1143-44 (award of fees pursuant to 36 O.S. § 3629 is *mandatory* rather than *discretionary*); *Firstier Mortgage Co. v. Investors Mortgage Ins. Co.*, 930 F.2d 1508, 1512 (10th Cir. 1991) (award of attorney's fees to insurer as "prevailing party" was appropriate where insurer denied claimed loss prior to submission of proof of loss).

After the jury considered all evidence presented by Plaintiffs and Defendant, judgment was entered for Plaintiffs for breach of contract and bad faith. *Ex.1, Journal Entry of Judgment*. Pursuant to 36 O.S. § 3629(B), costs and attorney fees **shall be** allowable to Plaintiffs as the prevailing party. Further, it does not appear Defendant will dispute Plaintiffs' entitlement to attorney fees. Plaintiffs' attorney fee application should be granted.

### **III. THE ATTORNEY FEES REQUESTED BY PLAINTIFFS ARE REASONABLE.**

Oklahoma follows a two-step procedure for determining a reasonable attorney fee. In *State ex rel. Burk v. City of Oklahoma City*, 1979 OK 115, 598 P.2d 659, the court set forth the formula a trial court must apply in computing attorney fees. The procedure to be followed in determining a reasonable attorney fee is determining the hourly compensation on hours times rate basis and then, to add an additional amount based on the following guidelines: (1) time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal services properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Id.* at 661.

The strictly hourly figure arrived at by the court is called the time compensation factor. *Id.* **All other factors are classified as an incentive fee or bonus.** *Id.* Therefore, the trial court must first determine hourly compensation on an hour times rate basis, and to that factor add an amount determined from the applicable factors set forth above. *Id.* Also, the attorneys seeking a fee are entitled to reasonable fees for time spent on the application for their fee. *Id.* at 662.

In *Oliver's Sports Center, Inc. v. Nat'l Standard Ins. Co.*, 1980 OK 120, 615 P.2d 291, the Supreme Court adopted the *Burk* test to determine the amount of attorney fees recoverable under § 3629(B). In *Oliver's Sports*, the insured recovered \$160,000.00, the face amount of a fire insurance policy, and \$20,000.00 in compensatory damages for bad faith refusal to pay the fire loss claim under the policy. The district court allowed recovery of \$60,000.00 in attorney fees. The insured's attorney spent 245.5 hours on the case. Therefore, the attorney fee award "reflects an hourly rate of \$173.66." 1980 OK 120, ¶ 5. On appeal, the insurer unsuccessfully argued "the hourly rate should have been from \$60.00 to \$76.00 per hour, which would have resulted in a fee of from \$20,730.00 to \$25,912.50." *Id.* In affirming an award of attorney fees at the hourly rate of \$173.66 per hour **forty-two years ago**, the Supreme Court in *Oliver's Sports* applied the standard applicable to the evaluation of attorney fees in *Burk* to recovery of fees under § 3629(B). *Id.* at ¶ 6. Additionally, the Oklahoma Supreme Court has interpreted § 3629(B) to include fees for services performed by legal assistants and paralegals. See *Taylor v. Chubb Group of Ins. Companies*, 1994 OK 47, 874 P.2d 806.

In accordance with this procedure, Plaintiffs have submitted itemized and detailed time records of their lawyers and paralegals. *Ex. 1, Affidavit of J. Revell Parrish; Ex. 2, Itemized Time Entries.* Counsel for Plaintiffs has detailed the work performed in this case and the hourly rates charged. Such Affidavit and itemization of time entries prove the rates charged and time expended



are reasonable under the facts and circumstances of this case. The total number of attorney hours recorded on this exhibit and verified by the Affidavit as having been reasonable and necessary in the prosecution of this case, breaks down as follows:

<u>Attorney</u>	<u>Hours</u>	<u>Hourly Rate</u> <sup>1</sup>	<u>Amount</u>
Revell Parrish	1351.20	\$ 275.00	\$ 371,580.00
Reggie Whitten	31.40	\$ 750.00	\$ 23,550.00
Michael Burrage	22.60	\$ 750.00	\$ 16,950.00
Liz Davies	140.50	\$ 275.00	\$ 38,637.50
Jesse Ogle	55.00	\$ 225.00	\$ 12,375.00
Barbara Urtz	305.50	\$ 150.00	\$ 45,825.00
Vicki Trammell	22.20	\$ 150.00	\$ 3,330.00

This case was filed in Oklahoma County on December 28, 2017. Defendant filed its Answer on January 29, 2018, and then removed the case to the Western District of Oklahoma on February 2, 2018, on the basis that former Defendant Servpro was misjoined in the lawsuit. Plaintiffs filed a Motion to Remand on February 9, 2018, and the case was remanded back to the District Court of Oklahoma County on March 22, 2018. On August 20, 2018, Defendant filed an Offer of Judgment in the amount of \$75,000.00. Plaintiffs did not respond.

On September 13, 2018, Plaintiffs filed a Motion to Compel discovery responses from Defendant. On October 26, 2018, Plaintiffs' Motion to Compel was sustained in part, wherein the Court ordered production of responsive documents to most of the requests sought by Plaintiffs. The production was substantial. Defendant was required to produce more than 90,000 pages of responsive documents. The Court further ordered the production to be completed by April 5, 2019.

On March 1, 2019, Defendant removed the case again to the Western District of Oklahoma. On March 29, 2019, Plaintiffs filed a Motion to Remand. On September 3, 2019, the case was

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<sup>1</sup> Western District Judge Wyrick approved an attorney fee award after the Motion to Remand in this case based on the hourly rate of Revell Parrish and Liz Davies. At that time, Defendant did not object to the hourly rates of Mr. Parrish and Ms. Davies.

remanded back to this Court. Plaintiffs were also awarded fees associated with this remand as Judge Wyrick noted Defendant lacked an objectively reasonable basis for seeking removal and further reasoned Defendant concealed relevant facts from the Court.

On December 10, 2019, Plaintiffs and Defendant attended mediation, which failed. On December 19, 2019, Defendant filed an Offer of Judgment in the amount of \$400,000.00. Plaintiffs did not respond.

On June 16, 2020, a Scheduling Order was entered by this Court. The Scheduling Order was amended in October. Plaintiffs submitted their preliminary witness and exhibit list on February 22, 2021. Defendant submitted its preliminary witness and exhibit list that same day. Defendant also filed a Motion for Partial Summary Judgment seeking dismissal of Plaintiffs' bad faith claim and claim for punitive damages. A third Scheduling Order was entered on April 6, 2021. This Court denied Defendant's Motion for Partial Summary Judgment on May 14, 2021.

On August 25, 2021, Plaintiffs issued a subpoena duces tecum to Rimkus Consulting Group, Inc. The subpoena was met with heavy opposition from both Rimkus and Defendant. Rimkus produced its Project File to Plaintiffs without objection. On October 25, 2021, Plaintiffs filed a Motion to Compel responsive documents from Rimkus. On October 29, Defendant filed a Motion for Protective Order relating to a corporate representative deposition noticed by Plaintiffs. On February 10, 2022, the Court granted Plaintiffs' Motion to Compel against Rimkus in part and ordered to Rimkus to produce the amount of compensation it had been paid by Defendant and reports it had authored for Defendant on homeowners' claims for a certain period.

On May 23, 2022, Plaintiffs submitted their final witness and exhibit list. Defendant submitted its final witness and exhibit list the next day. On June 10, the Court approved the Journal

Entry sustaining Defendant's Motion for Protective Order relating to the corporate representative deposition.

On June 13, Plaintiffs filed a Motion to Enforce against Rimkus for failure to comply with the Court's prior Order. On June 22, the Pretrial Conference was held, and the Pretrial Conference Order was entered. On July 19, the Court heard Plaintiffs' Motion to Enforce against Rimkus. The Court sustained Plaintiffs' Motion and modified its prior Order to require Defendant to produce the Rimkus reports by August 1. On July 21, Defendant filed a Motion to Reconsider/Motion to Vacate the July 19 Order. Ultimately, this issue was resolved by agreement.

On July 29, Plaintiffs filed their deposition designations and motions *in limine*. On August 1, Defendant filed its Daubert Motion related to Plaintiffs' two expert witnesses and also filed its Motion *in limine* with 15 topics. On August 11, Defendant filed its counter-designations and objections to Plaintiffs' deposition designations. On August 18, the Court heard and ruled on Plaintiffs' Motions *in limine* and Defendant's Motions *in limine*. The Court also heard and denied Defendant's *Daubert* Motions.

On the eve of trial on August 24, Defendant filed a Motion to Continue Trial. Defendant's Motion was denied on August 25. Trial began on August 29, 2022, and lasted four full days. The jury unanimously found in Plaintiffs' favor on September 1, 2022. The verdict in Plaintiffs' favor totaled \$750,400.00.

The second step of the *Burk* analysis requires consideration be given to the grant of a bonus, over-and-above the lodestar amount based upon the following twelve guidelines:

1. The time and labor required;
2. The novelty and difficulty of the issues;
3. The skill requisite to perform the legal service properly;

4. The preclusion of other employment by the attorney due to the acceptance of the case;
5. The customary fee;
6. Whether the fee is fixed or contingent;
7. The time limitations imposed by the client or the circumstances;
8. The amount involved and the results obtained;
9. The experience, reputation, and ability of the attorneys;
10. The undesirability of the case;
11. The nature and length of the professional relationship of the client; and
12. Awards in similar cases.

The application of the *Burk* factors entitles Plaintiffs to an enhanced fee over-and-above the hourly rates. The amount involved and the results obtained, as well as the experience, reputation, and ability of Plaintiffs' attorneys support an enhanced fee under the second prong of *Burk*.

**A. The Lodestar Amount.**

Plaintiffs respectfully submit the lodestar amount in this case totals **\$512,247.50**. Application of the *Burk* factors shows that Plaintiffs should be entitled to an enhancement of that amount. This enhancement of the lodestar amount recognizes the fact that Plaintiffs' professional legal services related to the prosecution of Plaintiffs' claim is amply supported by the *Burk* factors.

**B. The *Burk* Factors.**

**1. The Time And Labor Required.**

A significant portion of Plaintiffs' lodestar amount is attributable to the aggressive defense tactics Defendant utilized throughout the prosecution of this case. Defendant's lawyers are experienced and qualified insurance defense attorneys within the State of Oklahoma. There was significant motion practice involved in this case. Defendant was required to produce more than

90,000 pages of documents during discovery. Rimkus was required to produce dozens of reports it authored for Defendant. Defendant removed this case to federal court **twice**.

If Plaintiffs had not prevailed with a verdict exceeding \$400,000.00, Defendant would have attempted to bankrupt Plaintiffs by making them responsible for its attorney fees. Although Plaintiffs believe Defendant's Offers to Confess are unenforceable based upon 36 O.S. § 3629, a specific fee-shifting statute, Defendant would have argued it was the prevailing party had the verdict been \$400,000.00 or less. Notwithstanding such tactics, Plaintiffs continued to prosecute their claims. The time spent by counsel was efficiently applied to achieve a successful result, and the result obtained is another factor supporting an increase in the hourly rate. *See, e.g., Cullen v. Whitman Med. Corp.*, 197 F.R.D. 136, 149 (E.D. Pa. 2000) ("I find that the time counsel spent on this case is a demonstration of their efficiency.") However, the actual time spent by counsel on the case, while a partial reflection of the value of the services performed, does not begin to reflect the full value of the services performed. Plaintiffs' counsels' time records reflect and verify a case increasing in value over the course of nearly five years from zero to a verdict of \$750,400.00. Plaintiffs' counsel was forced to litigate this case in two courthouses, against talented opponents, and proceed to trial at great risk. Considering these circumstances, a multiplier of the lodestar amount is reasonable.

## **2. The Novelty And Difficulty Of The Questions.**

"One of the basic considerations in establishing the reasonable value of legal services is the type, extent, and difficulty of the services rendered.... The intricacy and difficulty of the questions involved, and not necessarily the amount of manual legal work exhibited by the number of papers in the file of the case must control." *Robert L. Wheeler Inc. v. Scott*, 1989 OK 106, ¶ 9, 777 P.2d 394.

This case did involve difficult issues. Defendant utilized nuanced arguments in first-party bad faith litigations. Further, Defendant hired extremely experienced construction and insurance experts, while Plaintiffs also hired highly regarded and experienced insurance and engineering experts. Throughout the case, Defendant's counsel raised issues that were novel under Oklahoma law with respect to Plaintiffs' claims and their experts in its briefing of evidentiary and legal issues as set forth in Defendant's respective *in limine* motions and its Motion for Partial Summary Judgment. Although Plaintiffs ultimately secured a verdict, the original Offer of Judgment was \$75,000.00, and then subsequently increased to \$400,000.00. Plaintiffs' counsel's efforts resulted in securing a verdict approximately ten times greater than the original offer.

### **3. The Skill Requisite To Perform The Legal Services Properly.**

This "factor, which must be considered with the novelty or difficulty of the issues," focuses on "whether the services are routine, or whether exceptional skill or effort is required." *Robert L. Wheeler, Inc.*, 1989 OK 106 at ¶ 10. Plaintiffs will present evidence at the hearing concerning this motion of the skill required to present this case and obtain the ultimate result. The briefing on the issues in Defendant's Motion for Partial Summary Judgment and the parties' motions *in limine*, culminating in rulings favorable to Plaintiffs, speaks to the skill required to reach the result obtained.

Plaintiffs also had to overcome the constant evolving defenses Defendant manufactured throughout the trial. The Court sustained Plaintiffs' *Buzzard* Motion and ruled Defendant was precluded at trial from attempting to introduce evidence and defenses not raised during the claim. However, Defendant defied the Court's ruling numerous times. For example, Plaintiffs' counsel advised the Court prior to Mr. Berryman taking the stand that Mr. Berryman would testify Plaintiffs' home was improperly constructed — a matter never discussed or considered during the

handling of Plaintiffs' claim. Despite being warned by the Court to not do so, Defendant elicited testimony from Mr. Berryman that Plaintiffs' home was improperly constructed. The Court immediately sustained Plaintiffs' objection to this testimony, but the jury still heard this testimony. Similarly, in disregard of the Court's Order on Plaintiffs' *Buzzard* Motion, Defendant elicited testimony from its claims handling expert, Charles Levy, that some of Plaintiffs' damages (specifically the electrical) was not covered by their insurance policy because the damage had not "manifested" itself. Plaintiffs' counsel was required to quickly address this new theory on cross examination and in closing argument.

Additionally, despite admonishments from the Court, Defendant continued to violate the *Buzzard* ruling by repeatedly injecting and eliciting testimony with respect to the "upgrades" Plaintiffs did to their home when they obtained a loan to make necessary repairs. This was clearly done over and over to prejudice the jury and cast Plaintiffs in a negative light. Plaintiffs' counsel was required to repeatedly address this issue.

The verdict secured by Plaintiffs' counsel is surely some evidence of the skill employed to rebut the attacks and newly minted defenses manufactured by Defendant throughout the trial.

#### **4. Preclusion Of Other Employment Due To Acceptance Of Case.**

Defendant employed the law firm of Gable Gotwals to defend it. This law firm has at least 100 attorneys and has offices in Tulsa and Oklahoma City. Conversely, Plaintiffs' counsel's law firm had less than 10 lawyers when this lawsuit was initiated. Furthermore, Revell Parrish spent the most time on this case, which took him away from his significant caseload. When the demands of a case preclude the ability to do other work, this is a factor favoring an increase in the lodestar rate. *E.g., Oklahoma Turnpike Auth. v. Horn*, 1993 OK 123 ¶ 11, 861 P.2d 304 ("The firm was

precluded from taking other types of plaintiff litigation because of the demand placed upon the firm by the turnpike [condemnation] cases”).

#### 5. The Customary Fee/Whether The Fee Is Fixed Or Contingent.

The evidence will show that the customary fee in a breach of contract and bad faith case such as this is a contingency fee. The contingent nature of the fee requires the court to adjust the “lodestar” hourly rate to take into account the odds of success by Plaintiffs when the case began. “Although the court initially looks to the hourly rate for comparable representation where compensation is guaranteed, it must adjust the basic hourly rate where compensation is contingent by assessing the likelihood of success at the outset of the representation.” *Robert L. Wheeler, Inc.*, 1989 OK 106, ¶ 13. *Accord: Morgan v. Galilean Health Enterprises, Inc.*, 1998 OK 130, ¶ 14 n.30, 977 P.2d 357.

The fee contracted by Plaintiffs with counsel is a 50% contingency fee net litigation expenses.<sup>1</sup> *Ex. 1, Affidavit of Revell Parrish. Pursuant to the contingency fee contract*, Plaintiffs’ counsel has incurred \$38,782.93 in litigation expenses. *Id.* While the existence of a contingency fee contract is certainly not an absolute determining factor in fixing the attorney fee in this case, the fact that Plaintiffs are contractually obligated to pay 50% of any net recovery, plus reimburse expenses, is highly relevant in determining the proper fee to be awarded in this case. The reason is that fee shifting statutes such as 36 O.S. § 3629(B) have a primary purpose making whole the party who prevailed in the case. *See, e.g., Oklahoma Natural Gas Co. v. Apache Corp.*, 355 F. Supp. 2d 1246, 1253 (N.D. Okla. 2004), in which the court commented on the purpose of fee shifting statutes such as 12 O.S. § 936, which the court was applying, stating that the purpose

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<sup>1</sup> Total Recovery (including verdict, interest, attorney fees, and court award costs) minus expenses, thereafter, the 50% fee is calculated from the remaining balance.



of such statutes is “to make whole the successful party in... litigation” and “to create an economic incentive influencing decisions whether to pursue legal relief and whether to settle or resist a claim pressed by another.” Therefore, a primary consideration in fixing the upper adjustment of the prevailing hourly rate should be whether Plaintiffs, as the successful party, will be made whole if the court does not adjust the prevailing hourly rate to account for the contingency fee contract between Plaintiffs and their lawyers.

**6. The Risk Of Non-Recovery.**

The contingent nature of the fee is also relevant in considering another factor — the risk of non-recovery. This was a difficult case. There were many variables in play that could have resulted in a defense verdict or a verdict less than what was obtained. Although Plaintiffs disagree that Defendant’s Offer to Confess of \$400,000.00 was enforceable, Defendant would have argued it would be entitled to its fees if the verdict was equal to or less than its Offer to Confess. After nearly five years of litigation, there is no question Defendant’s attorney’s fees far exceed \$400,000.00. Thus, in a scenario where a verdict obtained by Plaintiffs less than that amount, the award to Plaintiffs would be nullified by what would arguably be owed in Defendant’s attorney’s fees. Had that been the case, that would bankrupt Plaintiffs. Clearly the actions of Defendant reflect the high risk to Plaintiffs’ counsel and their client that no recovery, or a significantly lesser recovery than was made, would occur in this case. Plaintiffs’ counsel assumed not only the risk they would not be compensated for their time, but also assumed responsibility for the significant cost of preparing the case.

**7. Time Limitations Imposed By The Client Or The Circumstances.**

The seventh *Burk* factor relates to unusual time limitations imposed by the prevailing party's case. Neither Plaintiffs nor their counsel are alleging there were any unusual time limitations imposed during this litigation. Thus, this particular *Burk* factor is irrelevant.

**8. The Amount Involved And The Results Obtained.**

While the amount involved is a relevant factor, the Supreme Court has observed that “[i]f the amount implicated, even though large in denomination, neither increases measurably the work nor enlarges the principles of law, it cannot be the deciding factor in setting a very high fee.” *Robert L. Wheeler, Inc.*, 1989 OK 106, ¶ 15. “Closely related to the element of the amount or value... at issue, is the solution achieved by the attorney. While the court should consider all the guidelines, it must also contemplate the benefit to the client as a result of the services.” *Id.* at ¶ 16.

The amount involved in this case and the result obtained are also significant factors supporting a substantial increase in the hourly rate. The \$750,400.00 verdict was ten (10) times larger than Defendant's original Offer of Judgment.

**9. The Experience, Reputation, and Abilities of Counsel**

“The attorney's standing in the profession for learning, ability, skill, and integrity is recognized as a proper matter for consideration in assessing the value of the services provided and can be a basis for a higher award. The reverse is also true: inexperience, apparent lack of ability, or poor performance may reduce the award.” *Robert L. Wheeler, Inc.*, 1989 OK 106, ¶ 17.

The experience, reputation, and abilities of Plaintiffs' counsel is closely related to the skill required to present Plaintiffs' case. The evidence at the hearing will be Plaintiffs' counsel are experienced first-party bad faith litigators who specialize on first-party insurance claims. Plaintiffs' counsel was opposed by extremely experienced and competent defense counsel who

have handled and tried many insurance cases. In fact, according to Gable Gotwals' website, the same counsel who tried this case for Defendant recently achieved victories at the trial court level on behalf of Defendant in three separate cases involving claims of bad faith. *See* <https://www.gablelaw.com/news-articles-blogs/press-releases/gablegotwals-represents-state-farm-fire-in-multiple-bad-faith-summary-judgment-wins/> (last visited October 24, 2022). The experience, reputation and ability of counsel are likewise additional factors warranting an upward increase in the hourly rate.

The testimony and other evidence at the hearing requested by Plaintiffs will more fully identify the reasons why an upward adjustment of the hourly rate should be allowed by the Court. Nevertheless, this summary reflects that such an upward increase is clearly warranted in this case.

In the instant action, the main issue litigated by the parties was whether and to what extent Defendant owed Plaintiffs pursuant to the insurance contract. Since liability was contested, well over 1,900 hours expended to successfully prosecute Plaintiffs' claims were necessary.

Although the attorney fees requested by Plaintiffs in this Motion near the amount of the actual damage verdict in the instant action, this does not mean that the attorney fee is unreasonable. Indeed, case law provides that there are situations in which an attorney fee award may be reasonable when it exceeds the judgment. *See Ame, Inc. v. Consol. Freightways*, 1989 OK CIV APP 57, 783 P.2d 499. Similarly, in *Am. Gen. Life Ins. Co. of Okla. v. Bean*, 1983 OK CIV APP 55, 671 P.2d 83, 84, the court held that the trial court's award of attorney fees, which was predicated on its reasoning attorney fees should be limited to an amount not in excess of the amount in controversy, was error and inconsistent with *Burk*. The court further stated neither the statute creating the award of attorney fees to the prevailing party, nor *Burk* contains such a limitation. *Id.* The critical language of *Burk* is that in establishing a reasonable attorney fee, the court is to

determine the hourly compensation on an hourly rate basis and add any additional amount based upon the enumerated guidelines.

Due to the factors present in this case, Plaintiffs respectfully request this Court apply an enhancement to the lodestar amount. Plaintiffs are also entitled to the fees and costs involved in preparing and presenting this Motion, in addition to bonus or fee enhancement the Court deems proper. *See Prandini v. Nat'l Tea Co.*, 585 F.2d 47, 53 (3d Cir. 1978) (“courts have consistently held that attorneys may be awarded, under statutory fee authorizations, compensation for the expenses of and time spent litigating the issue of a reasonable fee *i.e.*, for time spent on the fee application and successful fee appeals”).

#### IV. RECOVERABLE STATUTORY INTEREST.





Since Plaintiffs prevailed on their claims against Defendant, they are entitled to prejudgment interest at a rate of fifteen percent (15%) pursuant to 36 O.S. § 3629(B), which provides as follows:

It shall be the duty of the insurer, receiving a proof of loss, to submit a written offer of settlement or rejection of the claim to the insured within sixty (60) days of receipt of that proof of loss. Upon a judgment rendered to either party, costs and attorney fees shall be allowable to the prevailing party. For purposes of this section, the prevailing party is the insurer in those cases where judgment does not exceed written offer of settlement. In all other judgments the insured shall be the prevailing party. If the insured is the prevailing party, the court in rendering judgment shall add interest on the verdict at the rate of fifteen percent (15%) per year from the date the loss was payable pursuant to the provisions of the contract to the date of the verdict....

36 O.S. § 3629(B) (emphasis added).

Plaintiffs submitted their claim to Defendant on April 29, 2017. This date functions as the “proof of loss” to Defendant and the date the claim became payable. *See Dixon Produce, LLC v. Nat'l Fire Ins. Co. of Hartford*, 2004 OK CIV APP 79, 99 P.3d 725, 729 (any notice by an insured

provides the insurer sufficient proof of loss if the notice “serves the ultimate purpose of affording the insurer knowledge that can be acted upon.”). The date of the verdict is September 1, 2022. The verdict amount was \$750,400.00. The interest on the \$750,400.00 verdict, at 15% per year, is \$601,656.33. For the years from date of loss to verdict, the calculations are as follows:

Starting Amount (PV)?:	\$750,400.00
Annual Interest Rate?:	15.0000%
Days : 9 999 < = < 47,482 ?:	1.951
Start Date (year > 1969 ?):	04/29/2017 
End Date (year < 2100 ?):	09/01/2022 
Compounding?:	Exact/Simple 
Days In Year?:	365 
Interest Earned:	\$601,656.33
Future Value (FV):	\$1,352,056.33
Annual Percentage Yield (APY):	11.6446%
Daily Interest Rate:	0.0411%

Calc
Clear
Print
Help

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In accordance with 36 O.S. § 3629(B), Plaintiffs respectfully request prejudgment interest of **\$601,656.33** based on the verdict.

#### V. RECOVERABLE STATUTORY COSTS.

The general cost statute, 12 O.S. § 928, states, “Where it is not otherwise provided by this and other statutes, costs shall be allowed of course to the plaintiff, upon a judgment in his favor, in actions for the recovery of money only, or for the recovery of specific, real or personal property.” However, other statutes also entitle a plaintiff to recovery of costs in this action. Under 12 O.S. § 940(A), Plaintiffs, as the prevailing party, are entitled to recover not only attorney fees but also

costs, as shown in Section I, *supra*. True and correct copies of invoices and documentation in support of the recoverable costs discussed below are attached hereto as Ex. 3.

One source of statutory costs is 12 O.S. § 942, which states:

A judge of any court of this state may award the following as costs:

1. Any fees assessed by the court clerk or the clerk of the appellate court;
2. Reasonable expenses for the giving of notice, including expenses for service of summons and other judicial process and expenses for publication;
3. Statutory witness fees and reasonable expenses for service of subpoenas;
4. Costs of copying papers necessarily used at trial, limited to the amount authorized by law. If no amount is specified, costs of copying papers shall be limited to ten cents (\$0.10) per page;
5. Transcripts of the trial or another proceeding that the court determines are necessary to resolve the case;
6. Reasonable expenses for taking and transcribing deposition testimony, for furnishing copies to the witness and opposing counsel, and for recording deposition testimony on videotape, but not to exceed One Hundred Dollars (\$100.00) per two-hour videotape, unless the court determines that a particular deposition was neither reasonable nor necessary; and
7. Any other expenses authorized by law to be collected as costs.

**A. Fees Assessed by The Court Clerk.**

Filing Fee (McIntyre Law P.C.)	\$ 252.14
Jury Fee (Whitten & Burrage)	\$ 349.00
<b>TOTAL:</b>	<b>\$ 601.14</b>

**B. Fees for Giving Notice/Service of Summons.**

Service on Defendant State Farm c/o Oklahoma Insurance Department	\$ 20.00
<b>TOTAL:</b>	<b>\$ 20.00</b>

**C. Fee for Witnesses and Service of Subpoenas.**

Service of Deposition Subpoena on Mark Wesley:	\$ 148.00
Deposition Fee of Jim Gendill, P.E.:	\$ 317.50
Service of Trial Subpoena for Mark Leathers:	\$ 205.00
Trial Witness Fee for Mark Wesley:	\$ 166.25
Trial Witness Fee for Jack Buben:	\$ 35.00
Trial Witness Fee for Jason Taylor:	\$ 41.25
<b>TOTAL:</b>	<b>\$ 913.00</b>

**D. Cost of Copying Papers Necessarily Used at Trial.**

Under 12 O.S. § 942(4), “[t]he meaning of ‘papers necessarily used at trial’ is not limited to the exhibits entered into evidence but includes copies of all exhibits, including those provided to opposing counsel and the court.” *Stephenson v. Oneok Resources Co.*, 2004 OK CIV APP 81, ¶ 27, 99 P.3d 717.

Exhibit Boards for Trial	\$ 2,562.16
Trial Exhibits:	\$ 4,192.35
<b>TOTAL:</b>	<b>\$ 6,754.51</b>

**E. Transcripts of Proceedings and Trial.**

Transcript of Hearing (10/26/2018)	\$ 91.50
Transcript of Hearing (01/25/2022)	\$ 38.50
Transcript of Hearing (08/18/2022)	\$ 124.25
Trial Transcripts:	\$ 4,186.75
<b>TOTAL:</b>	<b>\$ 4,441.00</b>

**F. Deposition Expenses.**

Counsel for Plaintiffs deposed the following personnel and witnesses employed by or affiliated with Defendant: Mark Leathers, Jack Buben, Jason Taylor, Mark Wesley, and Johnny Phanthala.

The stenographic transcriptions and of all the depositions were used by Plaintiffs’ counsel to prepare the live direct examinations of the witnesses who were presented in Plaintiffs’ case-in-chief, and to prepare for the cross-examination of Defendant’s experts and witnesses. The

depositions were used to impeach and refresh the memory of the live witnesses who were deposed. Consequently, the depositions taken by Plaintiffs were clearly necessary for the proper preparation and presentation of Plaintiffs' case and to rebut Defendant's case.

Under § 942(6), the reasonable expenses not only of taking and transcribing deposition testimony, but also of videotaping the testimony and furnishing copies to the witnesses and opposing counsel, are recoverable costs unless the court finds "that a particular deposition was neither reasonable nor necessary." *See e.g., Fuller v. Pacheco*, 2001 OK CIV APP 39 ¶ 31, 21 P.3d 74 (stenographic and video deposition fees taxed as costs); *Atchley v. Hewes*, 1998 OK CIV APP 143, ¶ 8, 965 P.2d 1012; *Paulson v. Sternlof*, 2000 OK CIV APP 128, ¶¶ 16-17, 15 P.3d 981.

The current version of § 942(6) does not limit the amount recoverable for a stenographic transcript to the per-page rate authorized for the transcript of an official court reporter under 20 O.S. § 106.4. *See State ex rel. Oklahoma Bar Ass'n v. Israel*, 2001 OK 42, ¶¶ 30-31, 25 P.3d 909; *Stephenson v. Oneok Resources Co.*, 2004 OK CIV APP 81, ¶ 27, 99 P.3d 717. The statute does limit the taxable expense of videotaping a deposition to \$100.00 "per two-hour videotape."

The expenses incurred by Plaintiffs' counsel for taping and providing copies of the foregoing depositions are:

Deposition of Mark Leathers (12/02/2020)	\$ 1,947.47
Deposition of Jack Buben (12/09/2020)	\$ 1,902.30
Deposition of Mark Wesley (03/26/2021)	\$ 1,225.37
Deposition of Jason Taylor (06/02/2022)	\$ 1,966.39
Deposition of Johnny Phanthala (08/19/2022)	\$ 1,387.21
<b>TOTAL:</b>	<b>\$ 8,428.74</b>

**Total \$8,428.74** for originals and copies of stenographic transcripts and video costs.



**G. Summary of Taxable Costs.**

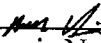
The taxable costs described in section III, *supra*, are summarized as follows:

<b>Fees Assessed by the Court Clerk:</b>	<b>\$ 601.14</b>
<b>Service of Summons and Subpoenas Fees:</b>	<b>\$ 933.00</b>
<b>Copy/Exhibit Costs for Trial:</b>	<b>\$ 6,754.51</b>
<b>Transcripts of Proceedings and Trial:</b>	<b>\$ 4,441.00</b>
<b>Deposition Expenses:</b>	<b>\$ 8,428.74</b>
<hr/>	
<b>TOTAL OF ALL TAXABLE COSTS:</b>	<b>\$ 21,158.39</b>

**CONCLUSION**

As the prevailing party, Plaintiffs are entitled to recover attorney fees for the necessary and reasonable hours of service performed by their counsel through the hearing on this Motion, calculated at market rates of \$750.00 per hour (Reggie Whitten and Mike Burrage), \$275.00 (Revell Parrish), \$275.00 per hour (Liz Davies) and \$225.00 per hour (Jesse Ogle) or increased pursuant to factors recognized for enhancement of base hourly charges. *Ex. 4, Affidavit of Joe White*. Plaintiffs further request statutory prejudgment interest in the amount of \$601,656.33 based upon 36 O.S. § 3629(B) and statutory costs in the total sum of \$21,158.39. Plaintiffs request an evidentiary hearing to determine the reasonableness of their requested fee award.

Respectfully submitted,

  
\_\_\_\_\_  
Reggie N. Whitten, OBA #9576  
Michael Burrage, OBA #1350  
J. Revell Parrish, OBA #30205  
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mburrage@whittenburragelaw.com  
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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2022, a copy of the above and foregoing was served via email and United States Mail, postage prepaid, to:

Lance E. Leffel, Esq.  
Jay P. Walter, Esq.  
John M. "Jake" Krattiger, Esq.  
Ashlyn M. Smith, Esq.  
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jkrattiger@gablelaw.com  
asmith@gablelaw.com

***Attorneys for Defendant  
State Farm Fire & Casualty Company***

  
\_\_\_\_\_  
J. Revell Parrish





4. As indicated in Plaintiffs' Motion for Attorney Fees and Costs and Brief in Support, Plaintiffs seek a lodestar amount of \$512,247.50, and request it be increased pursuant to factors recognized for enhancement of base hourly charges.

5. The hours billed by the attorneys and paralegals and fees incurred over the course of nearly five years are as follows:

<u>Attorney</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Amount</u>
Revell Parrish	1351.20	\$ 275.00	\$ 371,580.00
Reggie Whitten	31.40	\$ 750.00	\$ 23,550.00
Michael Burrage	22.60	\$ 750.00	\$ 16,950.00
Liz Davies	140.50	\$ 275.00	\$ 38,637.50
Jesse Ogle	55.00	\$ 225.00	\$ 12,375.00
Barbara Urtz	305.50	\$ 150.00	\$ 45,825.00
Vicki Trammell	22.20	\$ 150.00	\$ 3,330.00

6. The fees incurred by counsel for Plaintiffs relate to conducting discovery, reviewing nearly 100,000 pages of documents, briefing, two attempts by Defendant to remove this case to the Western District, two mediations, pre-trial evidentiary motions, trial preparation and the trial of this case.

7. An itemized, detailed listing of all time entered by each individual timekeeper is attached as Ex. 2 to the Motion. Where required, redactions have been made to protect attorney/client and work product privilege.

8. In addition, Plaintiffs are seeking to recover attorney fees being accrued by this firm in the preparation and presentation of their Motion for Attorney Fees and Costs.

9. The hourly rates and amount of time devoted to this matter are reasonable and necessary for the proper handling of this proceeding, and the rates charged are consistent with those rates being charged by other attorneys in this community for similar matters.

10. The rates charged by the attorneys and paralegals listed above and the time spent on this matter are reasonable under the customary factors set forth in *State ex rel. Burk v. City of Oklahoma City*, 1979 OK 115, 598 P.2d 659 and *Oliver's Sports Center, Inc. v. Nat'l Standard Ins. Co.*, 1980 OK 120, 615 P.2d 291. Such charges were necessary for the proper handling of this proceeding in light of the legal and factual issues presented by this lawsuit.

11. The amount of recoverable costs sought by Plaintiffs pursuant to 12 O.S. §§ 928, 940(A) and 942 is \$21,158.39. These costs are outlined in Plaintiffs' Motion. True and correct copies of invoices and documentation in support of said costs and expenditures are attached as Ex. 3 to the Motion.

10. In view of the factors set forth above, Affiant states the total fees and costs stated and sought in this case are reasonable under the circumstances of this case.

FURTHER AFFIANT SAYETH NOT.

DATED this 27<sup>th</sup> day of October, 2022.

J. Revell Parrish  
J. REVELL PARRISH

Subscribed and sworn to before me this 27<sup>th</sup> day of October, 2022.



(SEAL)

My Commission Expires: \_\_\_\_\_

[Signature]  
Notary Public



**Rowan v. State Farm**  
514.0001

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
11/9/2017	0.40	JRP	RECEIPT AND REVIEW OF EMAIL FROM JEREMY ROWAN RE: LETTER DEFENDANT SENT RE: COVERAGES 06.23.2017 LETTER
11/9/2017	0.40	VST	RECEIVED AND REVIEWED EMAIL FROM JRP AND CLIENT JR RE: LETTER DEFENDANT SENT RE: COVERAGES 06.23.2017 LETTER (1 ATTACHMENT)
11/27/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM SSM TO VST AND JRP REGARDING CLIENT CALLING TO CONFIRM EMAIL SHE SENT WAS RECEIVED
11/27/2017	0.40	VST	RECEIVED AND REVIEWED EMAIL AND ATTACHMENTS FROM JRP REGARDING CLIENT PHOTOS OF HOME
11/27/2017	1.80	VST	REVIEW EMAIL THREAD RECEIVED FROM JRP REGARDING NEW CASE - 9 EMAILS.
11/27/2017	0.40	VST	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENTS FROM JRP REGARDING NEW CLIENT CASE WITH EMAILS FROM COUNSEL LEAH HARTMAN.
11/27/2017	0.20	VST	REVIEWED ATTACHMENT IN EMAIL FROM COUNSEL LEAH HARTMAN REGARDING CLIENTS
11/27/2017	0.20	VST	EMAIL RECEIVED AND REVIEWED FROM SSM TO JRP AND VST REGARDING CLIENT INQUIRY ON ITEMS TO BRING TO MEETING AND EMAIL CONFIRMATION
11/28/2017	0.20	JRP	DRAFT EMAIL TO CLIENT REGARDING CONTRACT REVIEW AND TO CALL WITH QUESTIONS. CONTRACT ATTACHED.
11/28/2017	0.40	VST	EMAIL RECEIVED FROM JRP REGARDING DRAFTING ROWAN CONTRACT
11/29/2017	0.40	JRP	REVIEWED AND RECEIVED EMAIL FROM CLIENT MR REGARDING CONTRACT SIGNED.
11/29/2017	0.40	VST	RECEIVED AND REVIEWED EMAIL FROM JRP REGARDING ROWAN CONTRACT (1 ATTACHMENT)
11/30/2017	0.20	JRP	DRAFT EMAIL TO CLIENT REGARDING SERVEPRO DOCS.
11/30/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT ABOUT SERVPRO AND INVENTORY DOCUMENTATION AT HOURS BEING SENT TO STATE FARM. AND IF INVOICE IS NEEDED.
12/1/2017	0.40	VST	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENT (SCREENSHOT 2017-11.30 PNG) BETWEEN JRP AND CLIENT MR

EXHIBIT

2

exhibitstick.com



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
12/5/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR REGARDING UPDATE ON CASE STATUS AND SUIT STATUS
12/5/2017	0.20	JRP	DRAFT EMAIL IN RESPONSE TO CLIENT MR EMAIL ADVISING FINAL DRAFT SENT BY EOW.
12/5/2017	0.20	VST	EMAILS RECEIVED AND REVIEWED BETWEEN JRP AND CLIENT MR REGARDING CASE/LAWSUIT STATUS
12/7/2017	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM CLIENT REGARDING SERVPRO
12/7/2017	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM CLIENT REGARDING SERVPRO LABELING AND BOXING AS DINING ROOM TABLE CLEANED.
12/7/2017	0.20	JRP	EMAIL TO VST REGARDING ROWAN INVOICE AND SERVPRO ACTIONS ON CLEANING
12/7/2017	1.20	JRP	REVIEWED EMAIL RECEIVED FROM CLIENT WITH 4 PHOTOS ATTACHED REGARDING ITEMS FROM TV CONSOLE AND IN TWO BOXES THAT SERVPRO INACCURATELY MARKED.
12/7/2017	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR REGARDING SECTIONAL CLEANING AMOUNT & PHOTO OF COUCH/AMOUNT
12/7/2017	1.20	VST	RECEIVED AND REVIEWED EMAIL THREAD WITH DOCUMENT ATTACHMENT REGARDING CLIENT FURNITURE AND CASE DAMAGES (5 EMAILS)(1 ATTACHMENT)
12/7/2017	0.20	VST	RECEIVED AND REVIEWED EMAIL FROM JRP RE: ATTACHMENTS (NINE) ON CLIENT PHOTOS OF HOME AND PLACED IN FILE.
12/7/2017	0.40	VST	RECEIVED AND REVIEWED EMAIL FROM JRP AND CLIENT MR REGARDING INVOICE & SECTIONAL CLEANING AMOUNT - PHOTO REVIEWED
12/11/2017	3.40	JRP	BEGIN DRAFTING LAWSUIT - REVIEW FILE IN PREPARATION FOR SAME
12/12/2017	0.20	JRP	DRAFT EMAIL TO CLIENT REGARDING LAWSUIT (DRAFT) WITH INSTRUCTIONS ON CONTACT WITH QUESTIONS AND MODIFICATIONS POST REVIEW
12/12/2017	0.20	JRP	RECEIVE AND REVIEW EMAIL FROM CLIENT REGARDING QUESTIONS ON STARTING POINT ON PETITION/REPAIRS/DEPOS/ALE
12/13/2017	0.40	JRP	DRAFT EMAIL TO CLIENT REGARDING QUESTIONS RECEIVED ON PETITION/REPAIRS/DEPOS AND ALE.

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
12/13/2017	0.20	JRP	EMAIL RECEIVED FROM CLIENT RE ALE
12/13/2017	0.20	JRP	DRAFT EMAIL TO CLIENT RE ALE
12/13/2017	0.20	JRP	EMAIL RECEIVED FROM CLIENT RE SERVPRO
12/13/2017	1.20	VST	RECEIVED AND REVIEWED EMAIL THREAD BETWEEN JRP AND CLIENT REGARDING DRAFT LAWSUIT - 6 EMAILS
12/13/2017	0.80	VST	RECEIVED AND REVIEWED EMAIL THREAD BETWEEN JRP AND CLIENT REGARDING APPROVAL OF PETITION DRAFTS.
12/18/2017	0.80	JRP	RECEIVED AND REVIEW EMAILS FROM ATTORNEY NKM, RNW, JRP CC: KC REGARDING CLIENT CASE FILING & CONFIRMATION ON NEW CLIENTS (4 EMAILS)
12/18/2017	0.80	JRP	DRAFT EMAILS IN RESPONDING TO THREAD ON 12.28.2017 REGARDING NEW CLIENT & CASE FILING (3 EMAILS)
12/18/2017	0.20	JRP	REVIEW EMAIL FROM ATTORNEY NM RE:CASE FILING.
12/18/2017	0.20	JRP	REVIEW EMAIL FROM RNW RE: CLIENT CONFIRMATION AND CASE FILING
12/18/2017	0.20	JRP	DRAFT EMAIL IN RESPONSE TO ATTORNEY NM - ON CASE FILING & NEW CLIENT
12/18/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL IN THREAD FROM ATTORNEY NKM - BETWEEN ATTORNEY NKM, JT, CC VST AND KC RE LAWSUIT
12/18/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL IN THREAD FROM ATTORNEY JT, FROM ATTORNEY NKM, CC VST AND KC RE CASE
12/18/2017	1.20	JRP	FINALIZE LAWSUIT
12/18/2017	1.20	VST	RECEIVED AND REVIEW EMAILS FROM ATTORNEY NKM, RNW, JRP CC: KC REGARDING FINALIZATION/ CLIENT CASE FILING & CONFIRMATION ON NEW CLIENTS (7 EMAILS)
12/18/2017	0.20	VST	RECEIVED AND REVIEWED EMAIL THREAD BETWEEN ATTORNEY NKM AND ATTORNEY JT REGARDING CASE FILING.
12/18/2017	1.40	VST	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENT FROM JRP REGARDING PREPARATION OF SUMMONS FOR EACH DEFENDANT RE: ROWAN V. SF ET AL
12/18/2017	0.20	VST	DRAFT EMAIL TO JRP REGARDING CONFIRMATION OF RE: ROWAN V. SF ET AL AND DOCUMENT RECEIVED

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
12/18/2017	0.20	VST	RECEIVED AND REVIEWED EMAIL WITH FROM JRP RE: ROWAN REGARDING PETITION SIG & SENDING OTHER DOCS TO ATTORNEY NKM
12/19/2017	0.20	JRP	DRAFT EMAIL TO CLIENT REGARDING FILING SUIT AND CONFIRM FILE CONFIRMATION DATE
12/19/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT REGARDING IF SUIT WAS FILED LAST WEEK.
12/19/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT ON CONFIRMATION LAWSUIT STATUS
12/19/2017	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM ATTORNEY NKM AND ATTORNEY JT REGARDING CASE FILING.
12/19/2017	0.60	VST	RECEIVED AND REVIEWED EMAIL THREAD FROM CLIENT AND JRP REGARDING CASE FILING STATUS
12/27/2017	0.20	JRP	DRAFT EMAIL IN RESPONSE TO CLIENT REGARDING LAWSUIT UPDATE.
12/27/2017	0.20	JRP	REVIEW EMAIL RECEIVED FROM CLIENT REGARDING INQUIRY ON ATTORNEY NKM FILING CASE -- CO-COUNSEL.
12/27/2017	0.20	JRP	DRAFT EMAIL IN RESPONSE TO CLIENT AND EXPLAIN REFERRAL PROCESS
12/27/2017	0.20	JRP	DRAFT EMAIL IN RESPONSE TO CLIENT INQUIRY
12/27/2017	0.20	JRP	REVIEW EMAIL RECEIVED FROM CLIENT REGARDING WANTING TO CALL ATTORNEY NKM ON FILING STATUS
12/27/2017	0.60	VST	RECEIVED AND REVIEWED EMAIL THREAD FROM CLIENT AND JRP REGARDING NKM AND CASE STATUS
1/2/2018	0.20	JRP	DRAFT EMAIL TO VICTORIA MATONI AT MCINTYRE LAW TO CONFIRM SUMMONS PETITION RECEIPT AND FILING FEE
1/2/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL AND ATTACHMENTS FROM VICTORIA MATONI AT MCINTYRE LAW
1/2/2018	0.20	VST	RECEIVED AND REVIEWED EMAIL FROM VICTORIA MATONI REGARDING CLIENT ROWAN ON PLEADING ATTACHMENTS
1/4/2018	0.20	VST	DRAFT LETTER TO OID REGARDING ROWAN V. STATE FARM & CASUALTY COMPANY
1/4/2018	1.00	VST	PREPARE MAILINGS TO OID RE SERVICE OF PETITION AND SUMMONS UPON STATE FARM
1/10/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT REGARDING OKLAHOMA INSURANCE DEPARTMENT

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
1/10/2018	0.20	JRP	DRAFT EMAIL TO CLIENT REGARDING ANSWER DUE FOR OID 01/28
1/10/2018	0.20	VST	EMAIL RECEIVED FROM JRP AND CLIENT MR REGARDING OID INQUIRY
1/11/2018	0.40	JRP	DRAFT EMAIL TO CLIENT MR REGARDING SERVPRO
1/11/2018	0.20	JRP	DRAFT EMAIL TO BRUCE ROACH AT BARROW GRIMM REGARDING DISCOVERY ON ROWAN
1/11/2018	0.60	JRP	EMAIL AND ATTACHMENT RECEIVED AND REVIEWED FROM CLIENT MR REGARDING OID LETTER
1/11/2018	0.60	VST	EMAIL AND ATTACHMENT RECEIVED AND REVIEWED FROM JRP REGARDING OID LETTER
1/23/2018	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM SSM RE: ERIC GOLDSTEIN - ATTORNEY FOR SERVPRO CALLING RE ROWAN
1/24/2018	0.40	JRP	RECEIVE AND REVIEW EMAILS FROM ERIC GOLDSTEIN AT CCMSI CLAIMS TO CONFIRM RESPONSIVE PLEADING EXTENSION: JERRY & MELINDA ROWAN
1/24/2018	0.20	JRP	DRAFT EMAIL TO ERIC GOLDSTEIN AT CCMSI CLAIMS REGARDING ROWAN CLIENT AND CONFIRM CONTENTS OF CALL AND EMAIL
1/24/2018	0.40	JRP	CALL WITH ERIC GOLDSTEIN AT CCMSI REGARDING PLEADING EXTENSION AND CLIENT JMR
1/24/2018	0.40	VST	RECEIVE AND REVIEW EMAIL FROM JRP WITH ERIC GOLDSTEIN AT CCMSI CLAIMS TO CONFIRM RESPONSIVE PLEADING EXTENSION: JERRY & MELINDA
1/29/2018	0.60	JRP	RECEIPT AND REVIEW OF STATE FARM'S ANSWER
1/30/2018	0.20	JRP	EMAILS WITH AED RE DRAFTING DISCOVERY REQUESTS
1/30/2018	0.20	AED	EMAILS WITH JRP RE DRAFTING DISCOVERY REQUESTS
2/2/2018	0.60	JRP	REVIEW STATE FARM'S NOTICE OF REMOVAL
2/5/2018	0.20	JRP	EMAIL TO CLIENT RE CASE STATUS; STATE FARM REMOVE CASE TO FEDERAL COURT
2/6/2018	0.20	JRP	RECEIPT AND REVIEW OF STATE FARM'S CORPORATE DISCLOSURE STATEMENT
2/6/2018	2.40	AED	BEGIN WORK ON MOTION TO REMAND
2/6/2018	3.00	AED	RESEARCH LEGAL ISSUES AND CASE IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND
2/7/2018	5.00	AED	WORK ON MOTION TO REMAND

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
2/7/2018	1.00	JRP	FINALIZE MOTION TO REMAND
2/7/2018	0.20	JRP	EMAIL TO BAU RE FINALIZING, CITE CHECKING MOTION TO REMAND
2/9/2018	0.60	BAU	PREPARATION OF AND ELECTRONICALLY FILE EOAS FOR RNW, MB, AND JRP IN WESTERN DISTRICT
2/9/2018	2.00	BAU	CITE CHECK, PROOF, FINALIZE AND ELECTRONICALLY FILE MOTION TO REMAND
2/28/2018	0.70	JRP	REVIEW SERVPRO ANSWER; RECEIPT AND REVIEW EOAS BY SERVPRO'S COUNSEL
2/28/2018	0.20	JRP	RECEIPT AND REVIEW OF SERVPRO'S CORPORATE DISCLOSURE STATEMENT
3/2/2018	1.20	JRP	REVIEW AND ANALYZE STATE FARM'S RESPONSE TO MOTION TO REMAND
3/2/2018	2.80	JRP	RESEARCH CASES CITED BY STATE FARM IN RESPONSE TO MOTION TO REMAND
3/9/2018	4.20	AED	WORK ON REPLY TO MOTION TO REMAND
3/9/2018	1.50	BAU	CITE CHECK, PROOF, FINALIZE AND ELECTRONICALLY FILE REPLY TO MOTION TO REMAND
3/16/2018	0.20	JRP	EMAIL TO MELINDA ROWAN RE CASE STATUS
3/19/2018	0.20	JRP	RECEIPT AND REVIEW OF STATUS AND SCHEDULING DOCKET ORDER
3/19/2018	0.20	BAU	RECEIPT AND REVIEW OF STATUS AND SCHEDULING DOCKET ORDER; DOCKET DEADLINES
3/19/2018	0.10	JRP	RECEIPT AND REVIEW EOAS BY STATE FARM'S COUNSEL
3/22/2018	0.60	JRP	REVIEW WESTERN DISTRICT'S ORDER TO REMAND BACK TO OKLAHOMA COUNTY DISTRICT COURT
3/23/2018	0.20	BAU	EMAIL RECEIVED AND REVIEWED FROM JRP AND VST REGARDING DIANNE FOR ROWAN CASE
3/23/2018	0.20	JRP	DRAFT EMAIL TO BAU AND VST REGARDING ROWAN V. SF TO SEND DOCS TO DIANNE FOR EXPT. TEST.
3/23/2018	0.20	VST	EMAIL RECEIVED FROM JRP AND BAU REGARDING DIANNE FOR ROWAN CASE
4/3/2018	0.20	JRP	DRAFT EMAIL TO CLIENT MR REGARDING RE: DEPOSITIONS
4/3/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR REGARDING PROGRESS ON SCHEDULE OF DEPOSITIONS

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
4/25/2018	4.00	JRP	PREPARE PLAINTIFFS' FIRST DISCOVERY REQUESTS TO STATE FARM
4/25/2018	0.40	BAU	FINALIZE PLAINTIFFS' 1ST DISCOVERY REQUESTS TO STATE FARM
4/30/2018	0.80	BAU	RECEIVED AND REVEIWED EMAILS BETWEEN VST, ATTORNEY JRP AND CLIENTS MR JR REGARDING ALE, SECURITY DEPOSITS AND OOP COSTS.
4/30/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENTS JR MR REGARDING RENT AND UTILITIES SINCE SF STOPPED PAYING FOR ALE
4/30/2018	0.20	JRP	DRAFTED EMAIL TO CLIENT MR AND JR TO ASSESS COSTS - : REQUEST FOR ALE INCLUDING RENT AMOUNT
4/30/2018	0.20	JRP	RECEIVED AND REVIEWED REPLY EMAIL FROM CLIENTS MR CC JR REGARDING PRIOR REPLY - SEC. DEPOSIT/OOP RE: ALE?
4/30/2018	0.20	JRP	DRAFT EMAIL TO CLIENTS REGARDING STATUS OF DISCOVERY AND CASE UPDATE. E SUBJECT: REPLY -
4/30/2018	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR AND JR REGARDING EXCEL SHEET OF COSTS ATTACHED WITH MAY RENT.SUBJECT: // EXCEL SHEET ATTACHMENT 04-30-18 COSTS
4/30/2018	0.20	VST	RECEIVED AND REVIEWED EMAIL FROM WETRANSFER TO CONFIRM THAT DIANE LUTHER RECEIVED FILES REGARDING/ DOWNLOAD RE: ROWAN/SF ANSWERS
4/30/2018	0.80	VST	RECEIVED AND REVEIWED EMAILS BETWEEN JRP, BAU AND CLIENTS MR JR REGARDING SECURITY DEPOSITS AND OOP COSTS
5/23/2018	0.20	BAU	RECEIVED AND REVIEWED EMAIL FROM MEGAN BUCHANAN ADVISING THAT CLIENT ROWAN CALLED AND WOULD LIKE RETURN CALL
5/23/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU REGARDING CLIENT ROWAN RE: READY TO TAKE LOAN OUT AND MAKE REPAIRS. WILL SEND EMAIL & WANTS TO DISCUSS WITH JRP
5/23/2018	0.20	JRP	DRAFT EMAIL TO BAU REGARDING CALL FROM CLIENT MR
5/23/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU ADVISING THAT CLIENT ROWAN CALL REQUEST
5/25/2018	0.20	BAU	RECEIVED AND REVIEWED EMAIL BETWEEN JRP AND ATTORNEY JEFFREY A CURAN AT GABLE GOTWALS REGARDING EXTENSION CONFIRMATION TO DISCOVERY REQUESTS

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
5/25/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM ATTORNEY JEFFREY A CURAN AT GABLE GOTWALS REGARDING EXTENSION CONFIRMATION TO DISCOVERY REQUESTS
5/25/2018	0.20	VST	RECEIVED AND REVIEWED EMAIL FROM JRP - BETWEEN JRP AND ATTORNEY JEFFREY A CURAN AT GABLE GOTWALS REGARDING EXTENSION CONFIRMATION TO DISCOVERY REQUESTS
6/4/2018	0.60	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENTS FROM CLIENT MR ON LETTER FROM STATE FARM - SENT TO WRONG HOUSE
6/5/2018	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM CLIENT REGARDING TIME TO DISCUSS QUESTIONS AND CASE
6/5/2018	0.40	JRP	DRAFT EMAIL RESPONSES TO CLIENT MR REGARDING LETTER RECEIVED & TIME TO DISCUSS
6/6/2018	0.20	JRP	DRAFT EMAIL TO BAU AND VST REGARDING CLIENT MR JR RE: LETTER CLIENT RECEIVED IN MAIL
6/6/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR RE: SF LETTER - 0522 PM
6/7/2018	0.20	JRP	DRAFT EMAIL TO ATTORNEY JEFFREY A. CURAN AT GABLE GOTWALS TO CONFIRM DECLINATION OF SF SETTLEMENT FROM CLIENT MR - ATTACHED 3 PAGE LETTER
6/7/2018	0.60	JRP	RECEIVED AND REVIEWED LETTER ATTACHED IN EMAIL FROM ATTORNEY JEFFREY A CURAN SUBJECT: RESPONSE - ROWAN V. STATE FARM RE: OFFER
6/7/2018	3.00	JRP	LEGAL RESEARCH RE POST-LITIGATION PROPERTY INSPECTIONS
6/7/2018	0.40	JRP	DRAFT EMAIL TO CLIENTS MR AND JR REGARDING SF RESPONSE AND INSPECTION REQUEST
6/7/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MRJR CONSENTING TO INSPECTION - AND CLARIFICATION OF FEES
6/7/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR AND JR DECLINING SF OFFER
6/7/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO CLIENTS MR AND JR REGARDING INSPECTION - ABSENCE BEST.
6/7/2018	0.20	VST	DRAFT LETTER VIA FACSIMILE - TO GABLEGOTWALS FROM JRP REGARDING SF INTENT AND DATES - ROWAN - REINSPECTION
6/7/2018	0.80	VST	RECEIVED AND REVIEWED EMAIL THREAD BETWEEN JRP, VST, CLIENT MR, CLIENT JR AND BAU REGARDING SF OFFERS



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
6/8/2018	1.40	JRP	REVIEW STATE FARM'S RESPONSE TO OUR 1ST DISCOVERY REQUESTS
6/12/2018	0.40	JRP	REVIEW SF RESPONSES TO PS RFAS
6/12/2018	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM ATTORNEY JEFFREY A. CURAN & MISTY WALLER RE: ROWAN V. SF RFA RESPONSES
6/13/2018	0.20	JRP	DRAFT AND SEND EMAIL TO CLIENT MR & VST IN RESPONSE TO SF INSPECTION INQUIRY - WILL FOLLOW UP
6/13/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR RE: SF INSPECTION // INQUIRY
6/14/2018	0.20	JRP	DRAFTED AND SENT EMAIL TO ATTORNEY JEFFREY A. CURAN CC MISTY WALLER, VST AND BAU REGARDING SEVEN DAYS AND REINSPECTION DATES.
6/26/2018	0.20	JRP	LETTER VIA FACSIMILE - TO: JEFFREY A. CURAN - GABLEGOTWALS FROM: ATTORNEY JRP - SUBJECT - ROWAN - REINSPECTION
6/27/2018	0.20	JRP	EMAIL RECEIVED AND REVIEW FROM CLIENT MR REGARDING INSPECTION
6/28/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO CLIENT MR AND JR ADVISING RECEIPT AND WILL FOLLOW UP AGAIN.
6/28/2018	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM ATTORNEY JEFFREY A. CURAN & MISTY WALLER CC. BAU, VST REGARDING DOCUMENT DELAYS
6/28/2018	0.20	JRP	DRAFT EMAIL TO ATTORNEY JEFFREY A. CURRAN CC MISTY A. WALLER; VICKI TRAMMELL; BARBARA URTZ - FOLLOW UP
6/29/2018	0.20	JRP	DRAFT EMAIL TO CLIENT MR JR TO ADVISE OF INSPECTION DATES THAT ARE AVAILABLE RE ROWAN HOME
6/29/2018	2.80	JRP	REVIEW SF AMENDED RESPONSES TO PS DISCOVERY
6/29/2018	3.00	JRP	BEGIN REVIEW SF DOCS PRODUCED BATES 1-865
6/29/2018	0.80	JRP	EMAIL RECEIVED AND REVIEWED WITH ATTACHMENTS OF D AMENDED RESPONSES FROM ATTORNEY JEFFREY A. CURAN
6/29/2018	0.20	JRP	RECEIVED AND REVIEW EMAIL FROM ATTORNEY JEFFREY A CURAN - WITH PASSWORD FOR DOCUMENTS PRODUCED
6/29/2018	0.80	VST	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENTS BETWEEN JRP AND ATTORNEY JEFFREY A CURAN REGARDING AMENDED RESPONSES ATTACHED



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
6/29/2018	0.20	VST	RECEIVED AND REVIEW EMAIL BETWEEN JRP AND JEFFREY A. CURAN- WITH PASSWORD FOR DOCUMENTS PRODUCED
7/2/2018	5.60	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 1-865
7/9/2018	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 1-865
7/12/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM ATTORNEY JEFFREY A. CURAN REGARDING CONFIRMATION OF REINSPECTION ON 07.24 WITH MIKE BERRYMAN AND SF.
7/12/2018	0.20	VST	RECEIVED AND REVIEWED EMAIL FROM JRP AND JEFFREY A. CURAN REGARDING DATE FOR REINSPECTION ON ROWAN CLIENTS
7/16/2018	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL, LANCE LEFFEL TO ADVISE THAT THERE WAS NO TIME CONFIRMED REGARDING INSPECTION - EARLIER IS BETTER
7/16/2018	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM JEFFREY A. CURRAN REGARDING PREFERENES TO START EARLIER THAN LATER.
7/19/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL AT GABLEGOTWALS REGADRING TIME FOR INSPECTION.
7/19/2018	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL, LANCE LEFFEL TO CONFIRM START TIME FROM BERRYMAN
7/24/2018	1.20	JRP	MEETING W/JEREMY & MELINDA ROWAN TO OPEN HOUSE PRIOR TO RE-INSPECTION
7/24/2018	5.00	JRP	TRAVEL AND ATTEND STATE FARM REINSPECTION OF ROWAN HOME
7/26/2018	0.20	JRP	LETTER TO: JEFFREY A. CURAN - GABLEGOTWALS FROM: ATTORNEY JRP - SUBJECT - ROWAN - REINSPECTION & HOME COMPLETION
7/27/2018	3.60	JRP	FINALIZE REVIEW SF DOCS PRODUCED 1-865
7/31/2018	0.40	JRP	MULTIPLE EMAILS WITH JEFF CURRAN REQUESTING MEET AND CONFER ON STATE FARM'S DISCOVERY RESPONSES AND LANCE LEFFEL TO TAKE OVER THIS MATTER
7/31/2018	0.20	JRP	EMAILS WITH LANCE LEFFEL RE MEET AND CONFER RE STATE FARM'S DISCOVERY RESPONSES
8/1/2018	0.20	JRP	EMAILS WITH LANCE LEFFEL RE PLAINTIFFS REJECTED STATE FARM'S SETTLEMENT OFFER BACK IN JUNE
8/3/2018	1.40	JRP	PREPARE FOR AND INITIATE CONFERENCE CALL WITH LANCE LEFFEL

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
8/20/2018	1.20	BAU	RECEIVED AND REVIEWED EMAIL FROM JRP REGARDING THREAD BETWEEN VST, GABLEGOTWALS LANCE LEFFEL, JEFFREY A. CURRAN REGARDING ROWAN ON MEET AND CONFER
8/20/2018	0.20	JRP	EMAIL TO DR. RAMSEYER RE INSPECTING HOME, REPAIRS, REVIEW OF ENGINEERING REPORTS, STATE FARM'S ESTIMATE AND ROWANS' CONTRACTORS' ESTIMATES
8/20/2018	0.20	JRP	RECEIVE SF OFFER TO CONFESS
8/20/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL, OPPOSING COUNSEL REGARDING COMMUNICATION ON MEET AND CONFER
8/20/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL, LANCE LEFFEL THAT INSPECTION IS SET AND OK TO PROCEED.
8/20/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL TO CHECK AND WILL CONFIRM ON MEET AND CONFER
8/20/2018	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL, BAU AND VST REGARDING CONFIRMATION OF MEET AND CONFER
8/20/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO OPPOSING COUNSEL, LANCE LEFFEL REGARDING WHEN P CAN REPAIR HOME AND CONFIRM MEET AND CONFER DISCOVERY DATE
8/20/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL, LANCE LEFFEL REGARDING PROTECTIVE ORDER REQUESTING REVIEW AND TO AGREE
8/20/2018	0.20	VST	RECEIVED AND REVIEWED EMAIL FROM JRP WITH OPPOSING COUNSEL, LANCE LEFFEL CC JEFFREY A. CURRAN REGARDING PROTECTIVE ORDER
8/20/2018	1.20	VST	RECEIVED AND REVIEWED EMAIL FROM JRP REGARDING THREAD BETWEEN CC BAU, GABLEGOTWALS LANCE LEFFEL, JEFFREY A. CURRAN REGARDING ROWAN ON MEET AND CONFER
8/28/2018	0.20	JRP	EMAIL TO DR. RAMSEYER WITH COLOR PHOTOS
8/30/2018	1.40	BAU	REVIEWED EMAIL AND ATTACHMENT RECEIVED FROM JRP AND VST AND DIANE MYERS AT GABLEGOTWALS REGARDING STATE FARM SUPPLEMENTAL DISCOVERY RESPONSES
8/30/2018	1.40	JRP	REVIEWED EMAIL AND ATTACHMENT RECEIVED FROM DIANE MYERS AT GABLEGOTWALS REGARDING DISCOVERY

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
8/30/2018	2.00	JRP	LETTER - TO: ATTORNEY JRP FROM: LANCE LEFFEL - SUBJECT: ROWAN - RE: PROTECTIVE ORDER PROPOSALS (7 PAGES)
8/30/2018	1.40	VST	REVIEWED EMAIL AND ATTACHMENT RECEIVED FROM JRP AND DIANE MYERS AT GABLEGOTWALS REGARDING STATE FARM SUPPLEMENTAL DISCOVERY RESPONSES
9/8/2018	0.20	JRP	EMAILS WITH DR. RAMSEYER RE REPORT
9/10/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR CC JR REGARDING ENGINEER REPORT AND HOME UPDATES.
9/11/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO CLIENT MR JR CC BAU VST ADVISING THAT ENGINEER REPORT TAKES TIME AND IS THOROUGH
9/11/2018	0.20	JRP	RECEIVED EMAIL FROM CLIENT MR REGARDING LENDER ASKING IF CLIENT HAD COPY
9/11/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO CLIENT MR CC JR BAU VST RE: ENGINEER REPORT AND IF LENDER ISSUES PRESENT
9/11/2018	0.90	BAU	PREPARATION OF EXHIBITS TO MOTION TO COMPEL
9/12/2018	4.00	BAU	REVIEW, REVISE AND CHECK CITES/QUOTES TO MOTION TO COMPEL
9/13/2018	6.80	AED	PREPARE PS MOTION TO COMPEL
9/13/2018	0.60	JRP	LETTER TO OPPOSING COUNSEL RE MOTION TO COMPEL HEARING
9/13/2018	0.80	BAU	FINALIZE MOTION TO COMPEL FOR FILING
9/25/2018	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL REGARDING MISSED CALL AND AVAILABILITY TO DISCUSS ROWAN CASE
9/27/2018	0.60	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL RE ROWAN V. SFCC TO MEMORIALIZE DISCUSSION RE: RFP 23, 21, 22, 11, 14 & PERFORMANCE REVIEWS. UNRESOLVED OF XACTIMATE AND MCKINSEY CO
9/27/2018	0.20	JRP	DRAFT EMAIL IN RESPONSE TO OPPOSING COUNSEL LANCE LEFFEL'S EMAIL OF RECAP OF CALL RE RFP
10/1/2018	2.40	JRP	REVIEW STATE FARM'S RESPONSE TO OUR MOTION TO COMPEL
10/1/2018	6.80	JRP	DISCUSS WITH CLIENTS AND DRAFT DISCOVERY RESPONSES TO SF 1ST SET OF DISCOVERY/REVIEW CLIENT DOCUMENTS TO PRODUCE

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
10/2/2018	1.00	JRP	REVIEW SF 1ST SET OF DISCOVERY TO PS
10/3/2018	1.20	JRP	DRAFT PROTECTIVE ORDER
10/3/2018	0.60	JRP	EMAIL RECEIVED WITH TWO ATTACHMENTS FROM CLIENT - REVIEWED - CLIENT WANTING TO DISCUSS MTC DOCS AND HEARING ATTENDANCE
10/3/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO ATTACHMENTS / PHOTOS AND INQUIRY RECEIVED FROM CLIENT REGARDING MTC DOCS AND COURT HEARINGS
10/3/2018	0.20	JRP	EMAIL TO CLIENT WITH STATE FARM'S FIRST DISCOVERY REQUESTS TO REVIEW AND RESPOND
10/5/2018	0.50	JRP	PREPARE PROPOSED PROTECTIVE ORDER
10/5/2018	0.20	JRP	EMAIL TO OPPOSING COUNSEL WITH PROPOSED PROTECTIVE ORDER
10/8/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OC LANCE LEFFEL REGARDING PROTECTIVE ORDER - SF REQUESTS ON PROTECTIVE ORDER
10/18/2018	3.20	AED	DRAFT PS REPLY TO RESPONSE TO MTC
10/19/2018	0.20	JRP	DRAFT AND SEND EMAIL TO OPPOSING COUNSEL LANCE LEFFEL: CC VST; BAU - NEGOTIATIONS ON PROTECTIVE ORDER
10/19/2018	1.50	BAU	REVIEW, REVISE, CHECK CITES/QUOTES, AND FINALIZE REPLY TO MOTION TO COMPEL, INCLUDING PREPARATION OF EXHIBITS
10/19/2018	0.20	BAU	EMAIL TO OPPOSING COUNSEL WITH REPLY TO MOTION TO COMPEL
10/23/2018	1.00	JRP	REVIEW SF 2ND SET OF DISCOVERY TO PS
10/26/2018	5.20	JRP	PREPARE FOR AND ATTEND HEARING ON OUR MOTION TO COMPEL
10/29/2018	0.20	JRP	EMAIL TO DR. RAMSEYER RE STATUS OF HIS REPORT
10/29/2018	1.90	JRP	WORK ON RESPONSES TO STATE FARM'S 1ST DISCOVERY REQUESTS
10/29/2018	0.20	JRP	EMAIL TO CLIENT RE REVIEW OF DISCOVERY RESPONSES AND VERIFICATIONS
10/30/2018	0.20	JRP	DRAFT EMAIL TO CLIENTS MR AND JR REGARDING VERIFICATIONS FOR BOTH CLIENTS ON 1ST SET WITH 2 ATTACHMENTS

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
10/30/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU REGARDING VERIFICATION ATTACHED
10/30/2018	0.20	JRP	DRAFT EMAIL TO BAU REQUESTING ADDITIONAL VERIFICATION RE ROWAN 1ST ROGS
10/30/2018	0.20	JRP	RECEIVED & REVIEWED EMAIL FROM CLIENT REGARDING ROWAN VERIFICATIONS FOR 1ST ROGS
11/1/2018	0.40	JRP	RECEIPT AND REVIEW EMAIL FROM BAU TO OPPOSING COUNSEL WITH PLAINTIFFS' DISCOVERY RESPONSES AND DOCUMENT PRODUCTION
11/1/2018	1.90	JRP	FINALIZE PLAINTIFFS' ANSWERS TO SF'S FIRST INTERROGATORIES & RFP; REVIEW DOCUMENT PRODUCTION
11/1/2018	1.30	BAU	FINALIZE DISCOVERY RESPONSES; WORK ON DOCUMENT PRODUCTION
11/1/2018	0.40	BAU	LETTER TO OPPOSING COUNSEL WITH PLAINTIFFS' RESPONSES TO STATE FARM'S DISCOVERY REQUESTS AND DOCUMENT PRODUCTION
11/2/2018	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL CC BAU; VST RE: JE ON LAST WEEK'S RULING
11/2/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO OPPOSING COUNSEL LANCE LEFFEL RE: TIMING & DOCUMENTS REQUESTED - AFFIDAVIT GOOD IDEA
11/2/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL REGARDING PRODUCTION TIMING, ORDERS, AND AFFIDAVIT
11/2/2018	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL RE: DRAFTING ORDER AND ISSUES THAT NEED TO BE WORKED OUT . TIMING ON PRODUCTION, RFI, AFFADAVIT AND PROTECTIVE ORDER RESOLUTION
11/2/2018	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL IN RESPONSE TO LIST OF TASKS STILL NEEDED FOR ROWAN - RE: HEARING TRANSCRIPT
11/7/2018	1.00	JRP	REVIEW SF MOTION FOR PROTECTIVE ORDER
11/12/2022	0.10	JRP	EMAIL TO BAU RE STATUS OF HEARING TRANSCRIPT
11/12/2018	0.10	BAU	EMAIL TO JRP RE STATUS OF HEARING TRANSCRIPT
11/14/2018	1.20	JRP	PREPARE AND FINALIZE PS ANSWERS TO SF 2ND SET OF DISCOVERY

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
11/14/2018	0.40	BAU	FINALIZE PLAINTIFFS' ANSWERS TO STATE FARM'S 2ND DISCOVERY REQUESTS
11/20/2018	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL IN RESPONSE TO TRANSCRIPT - RELIANCE ON COURT STATEMENTS - 60 DAYS OK?
11/20/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO OPPOSING COUNSEL LANCE LEFFEL IN RESPONSE TO HIS CONTENTIONS ON MODIFICATIONS AND CUSTOMIZATIONS IN 2012
11/20/2018	0.20	JRP	DRAFT RESPONSE EMAIL TO OPPOSING COUNSEL LANCE LEFFEL RE: CONTENTIONS ON PRODUCTION & CONFLICT DATES
11/20/2018	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL REGARDING ATTACHED TRANSCRIPT AND THE CLARITY ISSUES - SF THINKS 60 DAYS FOR PRODUCTION - AFFIDAVIT WILL BE PRODUCED AS WELL
11/20/2018	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL RE: ATTACHED TRANSCRIPT FROM 2012-2017 ORDER - DEPO DATES - HEARING RESET REQUEST
11/26/2018	5.80	AED	WORK ON RESPONSE TO STATE FARM'S MOTION FOR PROTECTIVE ORDER
11/26/2018	1.50	BAU	REVIEW, CHECK CITES/QUOTES, AND FINALIZE RESPONSE TO MOTION FOR PROTECTIVE ORDER
11/26/2018	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL; CC BAU, VST RE: COURT DISCUSSIONS ON MPO HEARING & JOURNAL ENTRY ISSUES WITH JUDGE PARRISH RULING ETC
11/27/2018	0.20	JRP	RECEIPT AND REVIEW OF SERVEPRO'S OFFER TO CONFESS JUDGMENT
11/27/2018	0.80	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENT FROM BAU TO JRP, LANCE LEFFEL OPPOSING COUNSEL, C BARROW CC VST REGARDING PLAINTIFF REPOSENSE TO SF MPO.
11/27/2018	0.40	JRP	DRAFT EMAIL TO OPPOSING COUNSEL, LANCE LEFFEL; CC VST BAU RE: JUDGE PARRISH RULING RFP REQUEST OF DOCUMENTS PRODUCED.
11/27/2018	1.20	JRP	PREPARE PLAINTIFFS' FIRST DISCOVERY REQUETS TO SERVPRO
11/27/2018	0.40	BAU	FINALIZE PLAINTIFFS' FIRST DISCOVERY REQUETS TO SERVPRO

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
12/6/2018	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL REGARDING DRAFT OF JOINT MOTION PREPARED - RFI INITIATED
12/10/2018	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM DIANE MYERS AT GABLE GOTWALS WITH ATTACHMENT: JOINT MOTION TO SETTLE JOURNAL ENTRY & HEARING DATE. CC: RNW, MB, LEL, VST, BAU
12/10/2018	0.20	JRP	REVIEWED EMAIL RECEIVED FROM LANCE LEFFEL REGARDING AGREED JOINT MOTION - HE WILL FILE
12/10/2018	0.20	JRP	EMAIL RECEIVED, REVIEWED, FROM OPPOSING COUNSEL LANCE LEFFEL CC BAU REGARDING AGREED CHANGES WITH ADDITIONAL STATEMENT
12/10/2018	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL OPPOSING COUNSEL WITH SIGNED JOINT MOTION ATTACHED.
12/10/2018	0.40	JRP	DRAFT EMAIL IN RESPONSE TO LANCE LEFFEL OPPOSING COUNSEL JOINT MOTION WITH JRP PROPOSED CHANGES - ATTACHED
12/11/2018	0.20	JRP	EMAIL RECEIVED FROM CLIENT MR REQUESTING RAMSEYER CONTACT INFO & HEARING RESET - INQUIRY DUE TO WEATHER OR CASE ISSUE?
12/12/2018	0.20	JRP	DRAFT EMAIL TO CLIENT MR IN RESPONSE TO INQUIRY ON HEARING
12/12/2018	0.40	JRP	REVIEW SF MOTION TO SETTLE JOURNAL ENTRY
12/21/2018	1.20	JRP	EMAILS RECEIVED, REVIEWED, AND RESPONDED FROM OPPOSING COUNSEL LANCE LEFFEL RE ROWAN V. SFFCC RE: DEPO DATES JAN NEGOTIATIONS
12/21/2018	0.20	JRP	DRAFT EMAIL TO CLIENTS REGARDING AVAILABLE DATES FOR DEPOSITIONS IN SECOND HALF OF JANUARY CC BAU
12/26/2018	0.40	JRP	EMAILS RECEIVED, REVIEWED, AND RESPONDED FROM OPPOSING COUNSEL LANCE LEFFEL RE: DEPO LOCATION
12/26/2018	0.20	JRP	DRAFT EMAIL TO BAU AND VST REGARDING EMAIL FROM BRUCE ROACH AND CHRIS BARROW RE: SUBJECT: ROWAN V. STATE FARM, ET AL.
12/26/2018	0.20	JRP	EMAIL REVIEWED AND RECEIVED FROM CHRIS A. BARROW AT BARROW GRIMM REGARDING CLIENT BRODOC TIME EXTENSION REQUEST GRANTING
1/2/2019	0.80	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAILS RECEIVED FROM CLIENT MR RE: DEPO DATE CONFIRMATION & PREP REQUEST



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
1/10/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM KIRSTIE CARTER AT MCINTYRE LAW, CC VST, NKM, MB REGARDING FILE TRANSFER & EMPL. NOT HERE
1/11/2019	1.80	JRP	REVIEW SERVPRO'S RESPONSES TO OUR DISCOVERY REQUESTS
1/11/2019	1.00	JRP	REVIEW SF REPLY TO RESPONSE TO MOTION FOR PO
1/17/2019	3.40	JRP	PREPARE FOR HEARING ON STATE FARM'S MOTION FOR PROTECTIVE ORDER AND JOINT MOTION TO SETTLE JOURNAL ENTRY
1/18/2019	2.20	JRP	PREPARE FOR AND ATTEND HEARING ON STATE FARM'S MOTION FOR PROTECTIVE ORDER AND JOINT MOTION TO SETTLE JOURNAL ENTRY
1/22/2019	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM LANCE LEFFEL, OPPOSING COUNSEL RE:PROPOSED JOURNAL ENTRY ATTACHED
1/22/2019	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM OPPOSING COUNSEL RE: P MTC - PROPOSED JE SENT SEPERATELY
1/25/2019	0.20	JRP	DRAFTED EMAIL TO CLIENTS JR AND MR REGARDING ROWAN - SETTLEMENT OFFER & CASE-SERVPRO
1/25/2019	0.20	JRP	DRAFTED RESPONSE EMAIL TO LANCE LEFFEL : ROWAN V. SFFCC -COMMENT RE RECOLLECTION
1/25/2019	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM LANCE LEFFEL OPPOSING COUNSEL DIRECTING TO LOOK AT TRANSCRIPT AND 2017 AFFADAVIT
1/25/2019	0.20	JRP	RECEIVED EMAIL FROM OPPOSING COUNSEL, LANCE LEFFEL TO RESIGN AS EOA ENTERED ON BLOCK
1/25/2019	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL OPPOSING COUNSEL TO ADVISE THAT SIGN. BLOCK DOES NOT HAVE HIS SIG.
1/27/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM ENGINEER, CHRIS RAMSEYER REGARDING INVOICE FOR THE ROWAN REPORT & ADDITIONAL UPDATES
1/27/2019	0.20	JRP	DRAFTED FOLLOW UP EMAIL TO CLIENTS JR AND MR REGARDING ROWAN - SETTLEMENT OFFER & CASE-SERVPRO CC: BAU, VST
1/28/2019	0.20	JRP	DRAFT RESPONSE EMAIL TO CHRIS RAMSEYER REGARDING ENGINEER REPORT INVOICE/ ROWANS
1/28/2019	0.20	JRP	EMAIL - TO: VICKI TRAMMELL FROM: ATTORNEY JRP - SUBJECT: SETTLEMENT AGREEMENT



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
1/28/2019	0.40	JRP	DRAFTED RESPONSE EMAIL TO BRUCE ROACH; CC: CHRIS A. BARROW; VST: BAU AFTER REVIEWING SETTLEMENT AGREEMENT
1/28/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BRUCE A. ROACH REGARDING CALL THIS MORNING RE: SETTLEMENT NEGOTIATIONS
1/28/2019	0.40	JRP	EMAIL AND ATTACHMENTS RECEIVED AND REVIEWED FROM BRUCE ROACH AT BARROW & GRIMM RE: ROWAN SETTLEMENT AGREEMENT
1/28/2019	0.20	JRP	DRAFT AND SEND EMAIL TO BAU VST RE: CLIENTS : FW: ROWAN V. BRODOC, LLC - CONFIDENTIAL SETTLEMENT
1/28/2019	0.20	JRP	EMAIL: TO: BRUCE E. ROACH; CC CHRIS A. BARROW; VICKI TRAMMELL; BARBARA URTZ FROM: ATTORNEY JRP SUBJECT: RE: SETTLEMENT AGREEMENT
1/28/2019	1.40	JRP	RECEIVED, REVIEWED, AND DRAFTED EMAILS TO LANCE LEFFEL OPPOSING COUNSEL REGARDING NEGOTIATIONS OF DRAFTS FOR MTC PROPOSALS - EMAIL THREAD (7 EMAILS) BETWEEN LL & JRP RE: ROWAN V. SFFCC - EDITS
1/28/2019	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL OPPOSING COUNSEL CC C. BARROW AND VST:BAU RE: SIGNATURE PAGE ATTACHED
1/28/2019	1.00	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAILS FROM LANCE LEFFEL; OPPOSING COUNSEL REGARDING JE NEGOTIATIONS AND BROAD WORDING TP SOFTWARE
1/28/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHEMENT REGARDING SIGNATURE PAGE ON ORDER FROM LANCE LEFFEL, OPPOSING COUNSEL.
1/29/2019	0.40	JRP	EMAILS RESPONDED. RECEIVED AND REVIEWED FROM LANCE LEFFEL OPPOSING COUNSEL RE: BRODOC WANTS TO DEPOSE ROWANS
1/30/2019	4.60	JRP	PREPARE FOR AND MEET WITH ROWANS TO DISCUSS THEIR DEPOSITIONS
1/30/2019	0.20	JRP	JOURNAL ENTRY ON PS' MOTION TO COMPEL
1/30/2019	0.20	JRP	JOURNAL ENTRY ON PROTECTIVE ORDER
1/30/2019	0.40	JRP	LETTER TO OPPOSING COUNSEL WITH RAMSEYER'S REPORT
1/30/2019	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL LANCE LEFFEL WITH UPDATES ON CLIENTS RE SETTLEMENT AND DISMISSAL
1/30/2019	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL OPPOSING COUNSEL CC BAU: VST RE: ROWAN V. SFFCC

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
1/30/2019	0.20	BAU	WORK ON PRODUCTION OF RAMSEYER REPORT
1/31/2019	8.60	JRP	PREPARE FOR AND PRESENT PLAINTIFFS FOR THEIR DEPOSITIONS
1/31/2019	0.20	JRP	LETTER COUNSEL FOR SERVPRO RE SETTLEMENT AGREEMENT - EXEC.
1/31/2019	0.20	JRP	DRAFT AND SENT EMAIL WITH ATTACHMENTS TO BRUCE ROACH AT GRIMM AND BARROW REGARDING DWP SERV PRO
2/11/2019	0.20	JRP	DRAFT RESPONSE EMAIL TO MEG. BUCHANAN REGARDING CLIENT REQUEST OF SETTLEMENT CHECK DIRECTIONS
2/11/2019	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM MEG BUCHANAN REGARDING SETTLEMENT CHECK TO SEND TO CLIENT HOUSE PER REQUEST
2/12/2019	0.40	JRP	LETTER - TO: MELINDA & JEREMY ROWAN FROM: ATTORNEY JRP: SUBJECT - SERVEPRO SETTLEMENT
2/12/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL WITH DOCUMENT PRODUCTION FROM BAU TO OPPOSING COUNSEL
2/12/2019	0.20	VST	DRAFTED LETTER TO ATTORNEY NKM REGARDING SERVPRO SETTLEMENT
2/12/2019	0.40	BAU	WORK ON DOCUMENT PRODUCTION: EMAIL TO OPPOSING COUNSEL WITH DOCUMENT PRODUCTION
2/19/2019	3.30	JRP	EMAIL RECEIVED AND REVIEWED FROM CHRIS HIRE & D&R REPORTING WITH 9 ATTACHMENTS RE: DEPO TRANSCRIPTS
2/19/2019	0.20	JRP	DRAFT EMAIL TO CLIENTS MR AND JR REGARDING NINE ATTACHEMENTS ENCLOSED - RE DEPO TRANSCRIPTS
2/21/2019	0.20	BAU	LETTER - TO: DR REPORTING & VIDEO FROM: BARBARA URTZ SUBJECT - ROWAN V. STATE FARM - JURAT & CORRECTION SHEETS OF CLIENTS RE: DEPO
2/21/2019	0.20	JRP	REVIEW SDT TO INCE ELECTRIC
2/21/2019	0.20	JRP	SDT TO MILLENNIUM ROOFING
2/27/2019	0.20	JRP	REVIEW AMENDED SDT TO INCE ELECTRIC
4/3/2019	0.20	JRP	REPOSENSE DRAFTED TO LANCE LEFFEL, OPPOSING COUNSEL VIA EMAIL RE: ALL DOCS DUE 01/30/19
4/3/2019	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL REGARDING DOCUMENT PRODUCTION DISCUSSION AND UNAVAILABLE UNTIL 4/16

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
4/4/2019	0.60	JRP	RECEIVED, REVIEWED, AND DRAFT RESPONSES TO RE: EMAIL THREAD TO LANCE LEFFEL, OC; KYLE D. EVANS, MISTY A. WALLER AND BAU RE: - SF HOPE THEY COMPLY WITH COURT ORDER
4/5/2019	4.00	JRP	BEGIN REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/5/2019	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM KYLE D. EVANS; CC LANCE LEFFEL, MISTY WALLER AND BAU REGARDING INDEX LISTING DATE RANGES AND ID DISC. REQUESTS
4/6/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/7/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/8/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/9/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/10/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/11/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/12/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/13/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/14/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/15/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/16/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/17/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/18/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/19/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/20/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/21/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/11/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/12/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/18/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/19/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/20/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/21/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/25/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
5/26/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/27/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/28/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
5/29/2019	4.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/1/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/2/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/3/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/4/2019	4.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/5/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/6/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/7/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/8/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/9/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
6/14/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT REGARDING NEW HOMEOWNERS INSURANCE AND UPDATES ON CASE REQUEST
6/17/2019	0.40	JRP	REVIEW AND RESPOND TO EMAILS FROM CLIENT REGARDING NEW INSURANCE HOMEOWNERS & FLOODING
6/17/2019	0.20	JRP	FORWARD EMAIL TO - TO: DEBBIE AGNEW; BARBARA URTZ FROM: ATTORNEY JRP; SUBJECT: NEW INSURANCE
7/16/2019	0.60	JRP	DRAFT EMAIL & RECEIVED, REVIEWED, TO EMAILS FROM LANCE LEFFEL CC BAU REGARDING ISSUES WITH COURT SUBJECT: ROWAN (PENDING MOTION TO REMAND & DEADLINES)
7/17/2019	0.20	JRP	DRAFT RESPONSE EMAIL TO CLIENT REGARDING EXPECTATIONS OF STATUS CONFERENCE AND RULING ON REMAND
7/17/2019	0.20	JRP	EMAIL RECEIVED, REVIEWED, FROM CLIENT REGARDING UPDATE AT STATUS CONFERENCE 08.08
7/25/2019	1.50	BAU	DRAFT JOINT STATUS REPORT AND DISCOVERY PLAN FOR JRP REVIEW
7/29/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU, TO OPPOSING COUNSEL LANCE LEFFEL WITH ATTACHMENT REGARDING JSR PROPOSED DRAFT (6 PAGES)

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
7/29/2019	0.80	JRP	DRAFT RESPONSE, RECEIVED AND REVIEWED EMAILS FROM LANCE LEFFEL & BAU REGARDING REVISIONS TO JSR.
7/29/2019	0.30	BAU	FINALIZE JOINT STATUS REPORT AND DISCOVERY PLAN: ELECTRONICALLY FILE SAME
8/3/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/4/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/5/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/6/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/7/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/10/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/11/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/12/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/13/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/14/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/15/2019	4.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/16/2019	4.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/17/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
8/18/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
9/16/2019	0.20	JRP	DRAFT RESPONSE EMAIL TO CLIENT MR REGARDING DATES AND JUDGE RULINGS INCLUDING ALTERNATIVE SCHEDULING.
9/16/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR REQUESTING QUICK UPDATE AND EXPECTATIONS RE: HEARING
9/16/2019	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL REGARDING FEES FOR WORK ASSOCIATED WITH SF SECOND REMOVAL.
9/16/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL. GABELGOTWALS REGARDING SF AND WHAT DEADLINE IS
9/16/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL. OPPOSING COUNSEL ADV. BAU SENDING SUPPORTING DOC FOR FEES TO GET PAYMENT MADE.
9/16/2019	0.20	JRP	DRAFT RESPONSE EMAIL TO LANCE LEFFEL. OPPOSING COUNSEL REGARDING DEADLINE DATES

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
9/17/2019	0.80	JRP	RECEIVED AND REVIEWED EMAIL TO OPPOSING COUNSEL LANCE LEFFEL CC JRP FROM BARBARA URTZ WITH THREE ATTACHMENTS OF UNOPPOSED MOTION AND FEE DETAIL & ORDER.
9/17/2019	0.60	JRP	RECEIVED, REVIEWED AND DRAFTED EMAILS IN RESPONSE TO OPPOSING COUNSEL, LANCE LEFFEL'S REQUEST OF MOTION OF ORDER WITH CHANGES. RE: ROWAN
9/17/2019	0.90	BAU	REVIEW, REVISE AND FINALIZE FEE MOTION, INCLUDING EXHIBIT THERETO; PREPARATION OF PROPOSED ORDER; ELECTRONICALLY FILE MOTION; SUBMIT PROPOSED ORDER TO COURT
9/26/2019	0.20	JRP	DRAFTED EMAIL TO LANCE LEFFEL OPPOSING COUNSEL REGARDING W9 FOR WB AND INSTRUCTIONS
9/26/2019	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL, OPPOSING COUNSEL REQUESTING W9, PAYMENT INSTRUCTIONS, AND OTHER NEEDED ITEMS FOR CASE INCL. ADDTL DEPO
9/26/2019	0.20	JRP	DRAFT EMAIL TO BAU AND VST RE: SUBJECT: FW ROWAN V. SFFCC - SETTLEMENT EXPLORATION
9/26/2019	0.20	JRP	DRAFT EMAIL TO CLIENT MR REGARDING OFFER/ADDTL DEPOS: FW ROWAN V. SFFCC - PLEASE DISCUSS WITH JR
10/2/2019	0.40	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL TO EXPLAIN CLIENT WILLINGNESS IN SETTLEMENT, DEMAND, AND CASE STRENGTHS
10/4/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/5/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/6/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/7/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/8/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/9/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/12/2019	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/13/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
10/15/2019	1.00	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAIL THREAD - (5 EMAILS) BETWEEN LANCE LEFFEL, OPPOSING COUNSEL, CC: BARBARA URTZ REGARDING SUBJECT: EMAILS WITH LEL RE STATUS OF CHECK



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
10/15/2019	0.40	JRP	RECEIVED AND REVIEWED LETTER - VIA OVERNIGHT AMY H. JENKINS & LANCE LEFFEL, OPPOSING COUNSEL SUBJECT: LETTER FROM LEFFELS WITH CHECK RE SANCTIONS
10/25/2019	0.40	JRP	RECEIVED, REVIEWED, AND RESPONDED IN EMAIL THREAD (2 EMAILS) BETWEEN JRP & LEL TO: LANCE LEFFEL CC: BARBARA URTZ FROM: ATTORNEY JRP SUBJECT: RE: ROWAN V. SFCC - CONFIDENTIAL SETTLEMENT COMMUNICATION - MEETING NEXT THURS
10/31/2019	0.20	JRP	REVIEWED AND RECEIVED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL RE: WILL BE IN TOUCH
10/31/2019	0.40	JRP	REVIEWED, RECEIVED, AND DRAFTED RESPONSE TO EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL RE: ACKNOWLEDGEMENT OF SETTLEMENT DEMAND - REQUESTING MEDIATION
10/31/2019	0.20	JRP	EMAIL TO CLIENT MR AND JR TO DISCUSS OPPOSING COUNSEL OFFER OF MEDIATION & FIGURES - PLEASE ADVISE WITH NEXT DECISION
11/1/2019	0.20	JRP	RECEIVED EMAIL FROM CLIENT WHO ADVISED THAT SHE WOULD LIKE TO TOUCH BASE RE EMAIL ON POSSIBILITY OF MEDIATION AND SETTLEMENT
11/1/2019	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
11/1/2019	0.20	JRP	TO: BARBARA URTZ; DEBBIE AGNEW FROM: ATTORNEY JRP SUBJECT: FW: FWD: ROWAN V. SFCC - CONFIDENTIAL SETTLEMENT COMMUNICATIONS -
11/2/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
11/3/2019	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
11/8/2019	0.20	JRP	TO: BARBARA URTZ; DEBBIE AGNEW FROM: ATTORNEY JRP SUBJECT: FW: JEREMY AND MELINDA ROWAN V. STATE FARM FIRE & CASULTY - RE: MEDIATION REQUEST
11/8/2019	0.20	JRP	EMAIL RECEIVED AND REVIEWED FROM OPPOSING COUNSEL, LANCE LEFFEL - \ MEDIATION INQUIRY
11/8/2019	0.40	JRP	DRAFT EMAIL TO CLIENTS MR AND JR REGARDING MEDIATION AND POTENTIAL OF SETTLEMENT SPOKE W/ OC - CASE MEDIATION
11/8/2019	1.00	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAILS FROM MIKE DUNCAN, MEDIATOR TO OPPOSING COUNSEL, LANCE LEFFEL AND JRP EMAIL THREAD (5 EMAILS)

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
11/12/2019	0.20	JRP	EMAIL - TO: LANCE LEFFEL CC: ATTORNEY JRP FROM: MICHAEL DUNCAN RE: JEREMY & MELINDA ROWAN V. STATE FARM FIRE & CASUALTY - 12/10 BOOKING DATE?
11/12/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL - TO: MIKE DUNCAN CC: ATTORNEY JRP FROM: LANCE LEFFEL SUBJECT: EVERYONE CAN DO 12/10 IF AVAILABLE
11/12/2019	0.20	JRP	DRAFT EMAIL - TO: BARBARA URTZ; DEBBIE AGNEW FROM: ATTORNEY JRP SUBJECT: 12/10 MEDIATION DATE RE: ROWANS
11/13/2019	0.20	JRP	DRAFT EMAIL TO CLIENT MR FOR CONFIRMATION RE: MEDIATION DATE SET 12/10
11/13/2019	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR RE: MEDIATION DATE SET 12/10
11/18/2019	0.40	JRP	RECEIPT AND REVIEW CONFIRMATION LETTER FROM DRC RE MEDIATION ON 12/10
11/18/2019	0.20	BAU	RECEIPT AND REVIEW CONFIRMATION OF MEDIATION LETTER FROM DRC; DOCKET MEDIATION AND SUBMISSION OF MEDIATION STATEMENT
12/2/2019	0.60	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAILS FROM OPPOSING COUNSEL LANCE LEFFEL SUBJECT: WILL REVIEW - WITH 3 INDEXES PRODUCED (3 EMAILS)
12/2/2019	5.60	JRP	PREPARE MEDIATION STATEMENT
12/2/2019	0.40	JRP	DRAFT EMAIL WITH DETAILS OF PRODUCTION NEEDED TO OPPOSING COUNSEL, LANCE LEFFEL SUBJECT: RE: ROWAN - DETERMINATION OF ACTUAL PRODUCTION FROM RFP
12/3/2019	0.40	JRP	DRAFTED EMAIL WITH MEDIATION STATEMENT TO MICHAEL D. DUNCAN AT CHUBBUCK RE: CONFIDENTIAL SETTLEMENT DISCUSSIONS
12/3/2019	1.20	BAU	REVIEW, REVISE AND FINALIZE MEDIATION STATEMENT; PREPARATION OF EXHIBITS TO MEDIATION STATEMENT; EMAIL TO MEDIATOR
12/10/2019	7.50	JRP	JRP: MEDIATION WITH MICHAEL DUNCAN
12/16/2019	0.60	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAILS FROM LANCE LEFFEL, OPPOSING COUNSEL TO: ATTORNEY JRP CC: BARBARA URTZ; KYLE D. EVANS FROM: LANCE LEFFEL SUBJECT: RE: ROWAN ACCEPTANCE OF MED. OFFER?
12/18/2019	0.40	JRP	RECEIVED, REVIEWED AND RESPONDED TO EMAILS IN EMAIL THREAD (2 EMAILS) - BETWEEN JRP/VT/CLIENT - TO:



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
			ATTORNEY JRP, VICKI TRAMMELL FROM: CLIENT MELINDA ROWAN SUBJECT: RE:RE - LAWSUIT INQUIRY FILING
12/19/2019	0.20	JRP	REVIEW SF OFFER TO CONFESS
1/2/2020	0.60	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO CLIENT MR & JR REGARDING OFFER TO CONFESS
1/18/2020	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
1/19/2020	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
1/22/2020	0.60	JRP	RECEIVED, REVIEWED AND RESPONDED TO EMAIL THREAD (3 EMAILS) TO: CLIENT MELINDA & JEREMY ROWAN FROM ATTORNEY JRP SUBJECT - RE: CASE OFFER TO CONFESS
1/25/2020	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
1/26/2020	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/1/2020	5.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/2/2020	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/3/2020	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/4/2020	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/5/2020	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/6/2020	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/7/2020	3.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/8/2020	6.00	JRP	CONTINUE REVIEW OF SF DOCS PRODUCED BATES 866-41556
2/9/2020	7.40	JRP	COMPLETE REVIEW OF SF DOCS PRODUCED BATES 866-41556
4/2/2020	0.20	JRP	DRAFT EMAIL TO - TO: BARBARA URTZ; CC: REGGIE WHITTEN REGARDING SF LAST MEDIATION OFFER
4/4/2020	5.00	JRP	BEGIN REVIEW SF DOCS PRODUCED BATES 41537-90347
4/5/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/6/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/7/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/8/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/9/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/10/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/11/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
4/12/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/13/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/14/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/15/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/18/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/19/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/20/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/21/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/22/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/23/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/24/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/25/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/26/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/27/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/28/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/29/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
4/30/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/2/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/3/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/4/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/5/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/6/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/7/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/8/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/9/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/10/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/11/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/12/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/13/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
5/14/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/15/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/16/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/17/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/18/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/19/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/20/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/21/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/22/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/23/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
5/24/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
6/4/2020	0.10	JRP	RECEIPT AND REVIEW EMAIL FROM MELINDA ROWAN RE CASE STATUS
6/5/2020	0.20	JRP	EMAIL TO MELINDA ROWAN RE CASE STATUS AND STRATEGY
6/9/2020	0.20	JRP	REVIEW SF MOTION TO ENTER
6/16/2020	2.00	JRP	PREPARE FOR AND ATTEND SCHEDULING CONFERENCE
7/6/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/7/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/8/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/9/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/10/2020	7.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/11/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/20/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/21/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/22/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/23/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/23/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/24/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/25/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
7/26/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/27/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/28/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/29/2020	6.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/30/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
7/31/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/1/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/2/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/3/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/4/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/5/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/18/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/19/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/20/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/21/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/22/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/25/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/26/2020	4.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
8/31/2020	3.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
9/2/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
9/3/2020	5.00	JRP	CONTINUE REVIEW SF DOCS PRODUCED BATES 41537-90347
9/4/2020	4.80	JRP	MEET WITH RNW AND MB RE SELECT DOCUMENTS FROM SF DOCUMENT PRODUCTION
9/4/2020	4.80	MB	MEET WITH RNW AND JRP RE SELECT DOCUMENTS FROM SF DOCUMENT PRODUCTION
9/4/2020	4.80	RNW	MEET WITH MB AND JRP RE SELECT DOCUMENTS FROM SF DOCUMENT PRODUCTION
10/1/2020	0.20	JRP	EMAIL TO LANCE LEFFEL REQUESTING DEPOS OF MARK LEATHERS AND JACK BUBEN
10/2/2020	1.40	JRP	MULTIPLE EMAILS WITH LANCE LEFFEL RE DEPOSITIONS. EXTENDING SCHEDULING ORDER DEADLINES

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
10/9/2020	0.20	JRP	EMAILS WITH LANCE LEFFEL RE STATUS OF EXTENDING DEADLINES AND DEPO DATES
10/13/2020	0.40	JRP	FOLLOW UP EMAIL TO LANCE LEFFEL RE SCHEDULING DEPOSITIONS AND EXTENDING DEADLINES
10/15/2020	0.40	JRP	EMAIL RECEIVED AND REVIEWED AND RESPONDED / FROM OPPOSING COUNSEL LANCE LEFFEL REGARDING APPLICATION RE: ROWAN V. STATE FARM - DRAFT WILL BE SENT THIS WEEK
10/15/2020	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL RE: LANCE LEFFEL ON WEL SUBJECT: ROWAN V. STATE FARM - WT EXHIBIT LIST DUE - AGREE UNECESSARY D/T EXTENTION
10/17/2020	0.80	JRP	RECEIVED AND REVIEWED EMAIL AND ANALYZED ATTACHMENTS FROM: LANCE LEFFEL SUBJECT: DRAFT MOTION FOR CONTINUANCE AND ORDER
10/18/2020	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL LANCE LEFFEL - SUBJECT: RE: ROWAN V. STATE FARM - WILL SIGN AND RETURN
10/19/2020	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL LANCE LEFFEL WITH TWO ATTACHMENTS SUBJECT: RE: ROWAN V. STATE FARM - SIGNED MOTION AND PROPOSED ORDER ARE ATTACHED.
10/20/2020	0.20	JRP	REVIEW AMENDED SCHEDULING ORDER
10/20/2020	0.20	JRP	DRAFTED EMAIL TO TO: BARBARA URTZ SUBJECT: FW: ROWAN V. STATE FARM - FIRST AMENDED SCHEDULING ORDER
10/20/2020	0.80	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAIL THREAD (3 EMAILS)(1 ATTACHMENT BETWEEN JRP & KC TO: ATTORNEY JRP FROM: KARI CYRS SUBJECT: ROWAN V. STATE FARM - NEW PRETRIAL SET
10/26/2020	0.20	JRP	DRAFT EMAIL TO CLIENT MELINDA ROWAN CC: BARBARA URTZ RE: CALL SCHEDULE - WEDNESDAY
10/26/2020	1.20	JRP	DRAFT, REVIEW, AND RECEIVED EMAIL THREAD (6 EMAILS) - BETWEEN LEL & JRP TO: LANCE LEFFEL CC: KYLE D. EVANS; BARBARA URTZ FROM: ATTORNEY JRP SUBJECT: RE: ROWAN V. STATE FARM - DEADLINE DATES TO HOLD
10/26/2020	0.20	JRP	REVIEWED AND RECEIVED EMAIL - FROM: CLIENT MELINDA ROWAN SUBJECT: CALL SCHEDULE MINI CONFERENCE REQUEST

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
10/27/2020	0.20	JRP	REVIEWED AND RECEIVED EMAIL - FROM: CLIENT MELINDA ROWAN SUBJECT: SCHOOL CANCELLATION - NEW DIFFERENT TIME CONF
10/28/2020	1.00	JRP	CONFERENCE CALL WITH MELINDA AND JEREMY ROWAN RE: CASE STATUS
10/28/2020	0.20	JRP	DRAFT EMAIL TO CLIENT MR CC: BARBARA URTZ RE: 9:30 CONF. TIME
11/10/2020	0.20	JRP	EMAIL REVIEWED AND RECEIVED FROM JEFFREY A. CURRAN - GABLE LAW RE: NO LONGER ON CASE.
11/10/2020	0.20	JRP	EMAIL RECEIVED AND REVIEWED TO JEFFREY A. CURRAN - GABLE LAW FROM: DEBBIE AGNEW SUBJECT - NOTICE TO TAKE DEPO
11/10/2020	0.20	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAIL THREAD (3 EMAILS) BETWEEN JRP/LEL - TO: ATTORNEY JRP CC: KYLE EVANS; BARBARA URTZ FROM ATTORNEY JRP SUBJECT: VIRTUAL SF DEPO LEATHERS INQUIRY & CONFIRMATION
11/10/2020	0.20	JRP	REVIEW AND REVISE NOTICE OF DEPOSITIONS OF JACK BUBEN AND MARK LEATHERS
11/10/2020	0.40	BAU	PREPARATION OF NOTICE OF DEPOSITIONS OF JACK BUBEN AND MARK LEATHERS
11/17/2020	0.30	BAU	PREPARATION OF CIVIL DOCKET TRANSFER ORDER FOR JUDGE TRUONG'S SIGNATURE
11/30/2020	3.00	JRP	PREPARE FOR MARK LEATHERS DEPOSITION; EMAIL TO BAU WITH POTENTIAL DEPO EXHIBITS
11/30/2020	2.50	BAU	PREPARATION OF EXHIBITS FOR DEPOSITION OF MARK LEATHERS; EMAILS WITH JRP RE SAME
12/1/2020	5.00	JRP	MEET WITH RNW AND PREPARE FOR MARK LEATHERS' DEPOSITION
12/1/2020	5.00	RNW	MEET WITH JRP AND PREPARE FOR MARK LEATHERS' DEPOSITION
12/1/2020	0.70	BAU	WORK ON ADDITIONAL EXHIBITS FOR MARK LEATHERS' DEPOSITION; PREPARATION FOR VIRTUAL DEPOSITION OF MARK LEATHERS
12/2/2020	6.00	RNW	PREPARE FOR AND TAKE DEPOSITION OF MARK LEATHERS
12/2/2020	4.00	JRP	APPEAR FOR DEPOSITION OF MARK LEATHERS
12/2/2020	0.20	JRP	EMAIL TO LANCE LEFFEL RE PLAINTIFFS' PRIOR SETTLEMENT OFFERS/DEMANDS ARE WITHDRAWN



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
12/2/2020	3.50	BAU	ATTEND AND PRESENT EXHIBITS AT VIRTUAL DEPOSITION OF MARK LEATHERS
12/3/2020	2.00	JRP	PREPARATION OF PLAINTIFFS' 2ND SET OF DISCOVERY REQUESTS TO STATE FARM
12/8/2020	0.20	JRP	EMAIL TO LANCE LEFFEL REQUEST DATES FOR DEPOSITION OF MARK WESLEY
12/8/2020	8.20	JRP	PREPARE FOR DEPOSITION OF JACK BUBEN
12/8/2020	0.30	BAU	PREPARATION OF CERTIFICATE OF SERVICE OF CIVIL DOCKET TRANSFER ORDER
12/8/2020	0.50	BAU	PREPARATION OF EXHIBITS FOR DEPOSITION OF JACK BUBEN
12/9/2020	4.00	JRP	PREPARE FOR AND TAKE DEPOSITION OF JACK BUBEN
12/9/2020	0.80	JRP	DRAFT EMAILS TO LANCE LEFFEL, OPPOSING COUNSEL CC BAU REGARDING ROWAN DEPOSITION.
12/9/2020	0.30	JRP	MULTIPLE EMAILS WITH LANCE LEFFEL RE DEPOSITION DATES FOR MARK WESLEY
12/9/2020	3.10	BAU	ATTEND AND PRESENT EXHIBITS AT VIRTUAL DEPOSITION OF JACK BUBEN
12/9/2020	0.30	BAU	EMAIL EXHIBITS TO DEPOSITION OF JACK BUBEN TO PROFESSIONAL REPORTERS
12/31/2020	0.20	JRP	RECEIVED AND REVEIWED EMAIL FROM: JEFFREY A. CURRAN - GABLE LAW RE: ROWAN V. STATE FARM - NOTICE TO TAKE DEPO - NO LONGER ON CASE.
12/31/2020	0.20	JRP	EMAIL TO LANCE LEFFEL FOLLOWING UP ON DEPO DATES FOR MARK WESLEY AND REQUESTING HIS PERSONNEL FILE
1/4/2021	1.00	JRP	REVIEW STATE FARM RESP. TO PLTFS' 2ND DISC.
1/6/2021	0.60	JRP	RECEIVED, REVIEWED, AND RESPONDED/DRAFTED TO EMAIL THREAD (3 EMAILS) FROM: LANCE LEFFEL SUBJECT: RE: ROWAN - REQUEST PUT IN THIS WEEK (AND WESLEY FILE)
1/14/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL: RE: ROWAN - FOLLOW UP ON WITNESS
1/21/2021	0.20	JRP	RECEIVE, REVIEWED, RESPONDED TO EMAIL THREAD - (3 EMAILS) BETWEEN JRP & LEL TO: LANCE LEFFEL CC: BARBARA URTZ FROM: ATTORNEY JRP - SUBJECT: FOLLOW UP ON W/T CONTACT AGAIN
1/29/2021	0.20	JRP	RECEIVED, REVIEWED, RESPONDED TO EMAIL THREAD - (3 EMAILS) BETWEEN JRP & LEL TO: ATTORNEY JRP CC:

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
			BARBARA URTZ FROM: LANCE LEFFEL - SUBJECT: WT CONTACT FORTHCOMING. DEPOS TODAY.
2/5/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL AGAIN TO FOLLOW UP ON WT. FOLLOW UP - SUBPOENA CAN BE ISSUED
2/5/2021	0.20	JRP	RECEIVED EMAIL FROM OPPOSING COUNSEL, LANCE LEFFEL: RE: ROWAN - INITIAL CONTACT KICKED BACK - NOTHING YET.
2/15/2021	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL, OPPOSING COUNSEL - RE: ROWAN - DID YOU GET IN CONTACT W/ GENTLEMAN?
2/22/2021	0.40	JRP	REVIEW AND REVISE PRELIMINARY WITNESS AND EXHIBIT LIST
2/22/2021	2.10	BAU	PREPARATION OF PRELIMINARY WITNESS AND EXHIBIT LIST FOR JRP REVIEW
2/22/2021	2.50	JRP	REVIEW SF MPSJ
2/22/2021	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL LANCE LEFFEL: JAKE KRATTIGER CC REVELL PARRISH; DEBBIE AGNEW FROM: BARBARA URTZ - SUBJECT - ROWAN V. STATE FARM ROWAN PRELIM REQ.
2/23/2021	0.20	JRP	RECEIVED, REVIEWED, AND DRAFTED TO EMAIL THREAD- (3 EMAILS) BETWEEN JRP & LEL TO: LANCE LEFFEL CC: BARBARA URTZ FROM: ATTORNEY JRP SUBJECT: MSPJ TRANSFERRED/NOTICE NOT RECEIVED
2/23/2021	0.20	JRP	DRAFT EMAIL TO TO: LANCE LEFFEL CC: BARBARA URTZ - RE: ROWAN WESLEY PERSONNEL FILE NOT RECEIVED.
2/25/2021	0.20	JRP	REVIEW SF MOTION TO ENTER
2/25/2021	0.60	JRP	RECEIVED AND REVIEWED EMAIL / ANALYZED ATTACHMENT - LETTER - TO: ATTORNEY JRP & FIRM FROM: LANCE LEFFEL SUBJECT: MOTION TO DISMISS (3 PAGES)
2/25/2021	0.40	JRP	RECEIVED AND REVIEWED EMAIL THREAD- (2 EMAILS) BETWEEN JRP & LEL TO: ATTORNEY JRP CC: BARBARA URTZ; DEBBIE AGNEW; KARI CYRS; KYLE D. EVANS SUBJECT: J. ANDREWS SET MSJ - MTE FOR GG
3/2/2021	3.60	JRP	RESEARCH CASES CITED BY SF IN MPSJ
3/9/2021	3.00	AED	BEGIN RESPONSE TO STATE FARM'S MPSJ
3/10/2021	4.60	AED	CONTINUE WORK ON RESPONSE TO STATE FARM'S MPSJ
3/11/2021	6.80	AED	WORK ON RESPONSE TO STATE FARM'S MPSJ



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
3/11/2021	1.40	BAU	PREPARATION OF EXHIBITS TO RESPONSE TO STATE FARM'S MOTION FOR PARTIAL SUMMARY JUDGMENT
3/11/2021	4.30	BAU	REVIEW, REVISE, CHECK CITES/QUOTES RE RESPONSE TO STATE FARM'S MOTION FOR PARTIAL SUMMARY JUDGMENT
3/12/2021	0.60	BAU	PREPARATION OF DEPOSITION SUBPOENA TO MARK WESLEY AND NOTICE OF ISSUANCE
3/12/2021	0.30	BAU	EMAIL TO PROCESS SERVER RE PERSONAL SERVICE OF DEPOSITION SUPBOENA ON MARK WESLEY
3/12/2021	2.40	JRP	FINALIZE RESPONSE TO SF MPSJ
3/12/2021	0.30	JRP	REVIEW AND REVISE DEPOSITION SUBPOENA TO MARK WESLEY
3/12/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU TO OPPOSING COUNSEL WITH PLAINTIFFS' RESPONSE TO STATE FARM'S MOTION FOR PARTIAL SUMMARY JUDGMEN
3/12/2021	1.10	BAU	REVIEW, REVISE, AND FINALIZE RESPONSE TO STATE FARM'S MOTION FOR PARTIAL SUMMARY JUDGMENT
3/12/2021	0.20	BAU	EMAIL TO OPPOSING COUNSEL WITH RESPONSE TO MOTION FOR PARTIAL SUMMARY JUDGMENT
3/15/2021	1.20	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO EMAIL THREAD - (6 EMAILS) BETWEEN LEL/JRP/BAU/KDE CC: BAU KED - SUBPOENA RECEIVED - MOVE DEPO DATES REQUEST
3/17/2021	0.60	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO EMAIL THREAD (3 EMAILS) BETWEEN JRP & LEL TO: ATTORNEY JRP CC: BARBARA URTZ; DEBBIE AGNEW; KARI CYRS; KYLE D. EVANS SUBJECT: MARK WESLEY NEED DEPO 1/ REQUEST PERSONNEL FILE AGAIN
3/18/2021	0.40	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO EMAIL THREAD (2 EMAILS) BETWEEN LEL/JRPTO: ATTORNEY JRP CC: BARBARA URTZ; KYLE D. EVANS FROM: LANCE LEFFEL SUBJECT - CONFIRMATION WESLEY DEPO 3/26 - REQUEST FOR PERSONNEL FILE SENT TO SF
3/19/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL, OPPOSING COUNSEL CC: BARBARA URTZ; KARI CYRS; KYLE D. EVANS FROM: LANCE LEFFEL RE: ROWAN VS. SFFCC - DEPO WESLEY
3/23/2021	0.50	BAU	PREPARATION OF FINAL WITNESS AND EXHIBIT LIST FOR JRP REVIEW

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
3/25/2021	1.40	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO EMAIL THREAD (7 EMAILS) TO: LANCE LEFFEL CC: BARBARA URTZ; JANET L. WRIGHT FROM: ATTORNEY JRP - RE: ROWAN - MARK WESLEY RECORDS
3/25/2021	6.40	JRP	PREPARE FOR DEPOSITION OF MARK WESLEY
3/25/2021	0.40	BAU	PREPARATION OF EXHIBITS FOR VIRTUAL DEPOSITION OF MARK WESLEY
3/26/2021	4.20	JRP	PREPARE FOR AND TAKE DEPOSITION OF MARK WESLEY
3/26/2021	2.50	BAU	PREPARE FOR, ATTEND AND PRESENT EXHIBITS AT VIRTUAL DEPOSITION OF MARK WESLEY
3/27/2021	8.00	JRP	REVIEW DOCUMENTS PRODUCED BY STATE FARM BATES 90348-92454
3/28/2021	6.00	JRP	CONTINUE REVIEW DOCUMENTS PRODUCED BY STATE FARM BATES 90348-92454
3/29/2021	8.00	JRP	CONTINUE REVIEW DOCUMENTS PRODUCED BY STATE FARM BATES 990348-92454
3/30/2021	4.00	JRP	COMPLETE REVIEW OF DOCUMENTS PRODUCED BY STATE FARM BATES 90348-92454
3/31/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL THREAD (2 EMAILS) BETWEEN JRP, LEL, MB, GW - OSCN TO: MICHAEL BURRAGE; LANCE LEFFEL CC. GINNA WILLARD FROM: LEE. HINDS SUBJECT - SCHEDULING ORDER REQUEST
3/31/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM GINNA WILLARD, JUDGE ANDREWS DEPUTY REGARDING PTC SCHEDULING. CC LANCE LEFFEL, MB; BAU
3/31/2021	0.20	JRP	DRAFTED RESPONSE EMAIL TO LANCE LEFFEL REGARDING EMAIL THREAD FROM LEE HINDS CC BAU TO JRP WITH ATTACHED ROWAN PROPOSED SCHEDULING ORDER
3/31/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL RE EMAIL THREAD (2 EMAILS) TO JRP CC BAU WITH SCHEDULING ORDER ATTACHED & INSTRUCTIONS (LEE HINDS, DEPUTY COURT CLERK)
4/2/2021	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL LANCE LEFFEL; KYLE EVANS CC BARBARA URTZ RE: ROWAN - MEET AND CONFER REQUESTED ON SF DEFICIENT DISCOVERY REQUESTS
4/2/2021	0.20	JRP	DRAFTED EMAIL TO LANCE LEFFEL, OPPOSING COUNSEL TO VERIFY IF HE IS HANDLING PTC BELOW L CC: BARBARA URTZ ROWAN V. STATE FARM CJ 2017-7301

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
4/2/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL RESPONSE FROM ATTORNEY LANCE LEFFEL REGARDING RE: ROWAN V. STATE FARM CJ 2017-7301 - YES. WILL GET BACK TO COURT BEFORE THE 7TH
4/5/2021	0.80	JRP	RECEIVED, REVIEWED, AND RESPONDED TO EMAIL THREAD (4 EMAILS) BETWEEN JRP, LEL, MB, GW, BAU- TO: ATTORNEY JRP; LANCE LEFFEL CC: MICHAEL BURRAGE; GINNA WILLARD; BARBARA URTZ RE: ROWAN VS. STATE FARM CJ-2017- 7301 - PRE TRIAL CONFERENCE THREAD
4/6/2021	0.20	JRP	REVIEW FILE STAMPED COPY OF SCHEDULING ORDER
4/27/2021	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL, OPPOSING COUNSEL CC: BARBARA URTZ SUBJECT: ROWAN - DISCUSSED INSUFF. DOC PRODUCTION REGARDING RIMKUS. UPDATE REQUESTED
4/27/2021	0.20	JRP	DRAFT EMAIL TO BAU RE: EMAIL WITH LANCE LEFFEL REGARDING INSUFFICIENT DOC PRODUCTION
4/27/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM LANCE LEFFEL, OPPOSING COUNSEL CC: BARBARA URTZ; THAT HE WILL FOLLOW UP WITH CLIENT AND ADVISE
4/29/2021	0.80	JRP	REVIEW SF REPLY TO RESPONSE TO SF MPSJ
5/4/2021	0.20	JRP	DRAFT EMAIL TO GINNA WILLARD, DEPUTY COURT CLERK CC RNW, MB, ASMITH, JUDGE ANDREWS, LEE HINDS, BAU RE: CJ-2017-7301 ROWAN SF MTC PSJ
5/4/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM ASHLYN SMITH RE: EMAIL FROM GINNA WILLARD, DEPUTY COURT CLERK CC RNW, MB, ASMITH, JUDGE ANDREWS, LEE HINDS, BAU RE: CJ-2017-7301 ROWAN RE ORAL ARGUMENTS
5/4/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM GINNA WILLARD, DEPUTY COURT CLERK CC RNW, MB, ASMITH, JUDGE ANDREWS, LEE HINDS, BAU RE: CJ-2017-7301 ROWAN RE ORAL ARGUMENTS
5/5/2021	0.20	JRP	DRAFT EMAIL TO LANCE LEFFEL, OPPOSING COUNSEL CC: BARBARA URTZ RE: FOLLOWING UP ON PTC FOR SF
5/5/2021	0.20	JRP	RECEIVED AND REVIEWED TO EMAIL FROM LANCE LEFFEL REGARDING PTC FROM 04/27 THAT HE WAS SUPPOSE TO FOLLOW UP ON
5/12/2021	0.60	JRP	RECEIVE AND REVIEW SF DOCS PRODUCED 92455-92482
5/14/2021	0.40	JRP	REVIEW ORDER ON SF MPSJ

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
5/14/2021	0.60	JRP	EMAIL RECEIVED AND REVIEWED FROM JUDGE ANDREWS REGARDING ROWAN RULING - TO: REGGIE WHITTEN, MICHAEL BURRAGE, REVELL PARRISH, LANCE LEFFEL, ASMITH, KEVANS, JAKE KRATTIGER CC: LEE HINDS, GINNA WILLARD, CHASE BARROW
5/14/2021	0.20	JRP	DRAFT AND SEND EMAIL TO: BARBARA URTZ, LIZ DAVIES ROWAN, ET.AL. V. STATE FARM & CASUALTY COMPANY, ET. AL. CASE NO. 2017-7301 MPSJ SF REVIEWED, P RESPONSE REVIEWED DECISIONS.
5/14/2021	0.20	BAU	RECEIPT AND REVIEW COURT'S RULING ON STATE FARM'S MPSJ
5/14/2021	0.50	BAU	PREPARATION OF JOURNAL ENTRY RE COURT'S RULING ON STATE FARM'S MPSJ FOR JRP REVIEW
5/15/2021	1.00	JRP	COMPLETE REVIEW OF SF DOCUMENTS BATES 92455-92482
5/19/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL RE ROWAN - PROPOSED ORDER: LANCE LEFFEL CC: BARBARA URTZ SUBJECT: ROWAN - PROPOSED ORDER ATTACHED. PLEASE ADVISE
5/24/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL TO FOLLOW UP ON EMAIL FROM 05/19/21 RE ROWAN PROPOSED ORDER
5/25/2021	0.60	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENT FROM OPPOSING COUNSEL LANCE LEFFEL (4 PAGES) CC: BARBARA URTZ L SUBJECT: ROWAN -SEE ATTACHED RE: PROPOSED ORDER
5/27/2021	0.40	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL WITH FILE STAMPED CERTIFIED COPY OF ORDER ATTACHED. 2021-05-27 ORDER RE MPSJ CC BAU
8/25/2021	1.40	JRP	PREPARE EXHIBIT A TO SUBPOENA DUCES TECUM TO RIMKUS
8/25/2021	0.70	BAU	PREPARATION OF SUBPOENA DUCES TECUM TO RIMKUS AND NOTICE OF ISSUANCE
9/10/2021	1.00	JRP	RECEIVE AND REVIEW STATE FARM'S OBJECTION TO SUBPOENA DUCES TECUM TO RIMKUS
9/10/2021	1.20	JRP	RECEIVED AND ANALYZED LETTER FROM MATT FELTY, COUNSEL FOR RIMKUS, WITH RIMKUS OBJECTIONS TO SUBPOENA DUCES TECUM
9/10/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM KRYSTA SCHULER AT LYTLE SOULE TO: REGGIE WHITTEN, MICHAEL BURRAGE, REVELL PARRISH CC: LANCE LEFFEL, JAKE KRATTIGER SUBJECT: ROWAN V. STATE FARM - LOR

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
9/10/2021	0.60	JRP	EMAIL RECEIVED AND ANALYZED FROM LANCE LEFFEL OPPOSING COUNSEL TO KRYSTA SCHULER; REGGIE WHITTEN; REVELL PARRISH; CC MATHEW FELTY; KYLE D. EVANS SUBJECT: RE: ROWAN V. STATE FARM - STATE FARM OBJECTIONS RE: RIMKUS
9/11/2021	3.40	JRP	LEGAL RESEARCH RE A PARTY'S STANDING TO OBJECT TO NON-PARTY SUBPOENA/LIMITATIONS AND SCOPE OF OBJECTIONS
9/13/2021	0.20	JRP	DRAFT EMAIL TO LIZ DAVIS CC: BARBARA URTZ RE ROWAN V STATE FARM
9/15/2021	0.80	JRP	EMAIL TO COUNSEL FOR RIMKUS RE RESPONSE TO ITS OBJECTIONS TO SUBPOENA DUCES TECUM
9/15/2021	1.50	JRP	MULTIPLE EMAILS WITH COUNSEL FOR STATE FARM AND RIMKUS RE THEIR OBJECTIONS TO SUBPOENA DUCES TECUM AND MEET AND CONFER CALL
9/16/2021	0.60	JRP	PREPARE FOR AND ATTEND MEET AND CONFER CALL WITH COUNSEL FOR RIMKUS AND STATE FARM RE OBJECTIONS TO SUBPOENA DUCES TECUM
9/20/2021	0.30	JRP	EMAIL TO COUNSEL FOR RIMKUS WITH SURVEY DISCUSSED DURING MEET AND CONFER CALL AND FOLLOW UP RE STATUS OF RIMKUS RESPONSE
9/20/2021	0.30	BAU	EMAIL TO DIANE LUTHER WITH DEPOSITIONS TAKEN IN THE CASE
9/27/2021	0.20	JRP	FOLLOW UP EMAIL TO COUNSEL FOR RIMKUS RE STATUS OF RIMKUS RESPONSE TO SUBPOENA DUCES TECUM
10/1/2021	0.40	BAU	PREPARATION OF 3230(C)(5) NOTICE TO STATE FARM
10/1/2021	0.20	BAU	EMAIL TO OPPOSING COUNSEL WITH 3230(C)(5) NOTICE TO STATE FARM
10/1/2021	0.20	JRP	REVIEW AND REVISE PRELIMINARY WITNESS & EXHIBIT LIST
10/1/2021	2.20	JRP	PREPARE TOPICS FOR 3230C5 DEPOSITION NOTICE TO SF
10/1/2021	0.40	BAU	PREPARATION OF PRELIMINARY WITNESS AND EXHIBIT LIST FOR JRP REVIEW
10/1/2021	1.20	JRP	REVIEW AND RECEIVED EMAIL FROM BAU TO OPPOSING COUNSEL. LANCE LEFFEL; KYLE D. EVANS; JAKE KRATTIGER; KARY CYRS; ASHLYN SMITH; CC: ATTORNEY JRP; DEBBIE AGNEW SUBJECT: ROWAN V. STATE FARM ATTACHMENTS PWE NOTICE OF DEPO
10/1/2021	0.20	BAU	EMAIL TO DIANE LUTHER WITH RAMSEYER REPORT

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
10/6/2021	0.20	BAU	EMAIL TO DIANE LUTHER WITH OID COMPLAINT
10/18/2021	0.60	JRP	RECEIVED AND ANALYZED LETTER SENT FROM OPPOSING COUNSEL LANCE LEFFEL - (3 PAGES) TO: REGGIE N. WHITTEN; MICHAEL BURRAGE; ATTORNEY JRP: RE: ROWAN V. STATE FARM; CASE NO. : CJ-2017-7301 NOTICE OF DEPO OF CORPORATE REP SFCC OBJECTIONS
10/21/2021	0.60	JRP	REVIEW SF LETTER OBJECTING TO 3230C5 NTOICE
10/21/2021	0.40	JRP	EMAILS RECEIVED AND RESPONDED TO (2 EMAILS) BETWEEN LEL/JRP TO: LANCE LEFFEL CC: BARBARA URTZ; KARI CYRS; KYLE D. EVANS; ASHLYN SMITH; FROM: REVELL PARRISH SUBJECT: RE: ROWAN V. STATE FARM - OBJECTIONS TO CORP. REP NOTICE
10/21/2021	0.80	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING CONSEL LANCE LEFFEL CC: BARBARA URTZ; KARY CYRS; KYLE D. EVANS; ASHLYN SMITH SUBJECT: ROWAN V. STATE FARM - OBJECTION LETTER ATTACHED
10/21/2021	0.40	BAU	PREPARATION OF SUPPLEMENTAL DOCUMENT PRODUCTION; EMAIL TO OPPOSING COUNSEL WITH DOCUMENT PRODUCTION
10/21/2021	1.20	AED	WORK ON MOTION TO COMPEL RE: RIMKUS
10/22/2021	4.60	JRP	REVIEW ROWAN PROJECT FILE PRODUCED BY RIMKUS AND COMPARE WITH SF PRODUCTION
10/23/2021	3.80	AED	LEGAL RESEARCH ENFORCING NON-PARTY SUBPOENA COMPLIANCE AND NON-PARTY OBJECTIONS
10/24/2021	3.20	AED	WORK ON MOTION TO COMPEL RE RIMKUS
10/24/2021	1.00	JRP	REVIEW AND REVISE MOTION TO COMPEL RE RIMKUS
10/25/2021	3.10	BAU	REVIEW, CHECK CITES/QUOTES, AND FINALIZE MOTION TO COMPEL RE RIMKUS, INCLUDING PREPARATION OF EXHIBITS
10/25/2021	1.60	JRP	RECEIVE, REVIEW, AND RESPOND TO EMAIL THREAD (8 EMAILS) BETWEEN JRP & LEL - TO: LANCE LEFFEL CC: BARBARA URTZ; KARY CYRS; KYLE EVANS; ASHLYN SMITH FROM: ATTORNEY JRP SUBJECT: RE: FOLLOW UP FROM 10/21/21 TO DISCUSS OJECTIONS OF SF
10/26/2021	1.80	JRP	PREPARE FOR AND MEET/CONFER CALL WITH LANCE LEFFEL RE: CORP REP DEPO NOTICE ]
10/29/2021	3.60	JRP	REVIEW SF MOTION FOR PROTECTIVE ORDER OF CORP REPRESENTATIVE AND RESEARCH CITED CASE LAW
11/1/2021	0.50	JRP	REVIEW AND REVISE FINAL WITNESS AND EXHIBIT LIST



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
11/1/2021	0.60	JRP	REVIEW SF FINAL W/E LIST
11/1/2021	0.20	JRP	REVIEW SF SDT TO ANASAZI
11/1/2021	0.50	BAU	PREPARATION OF FINAL WITNESS AND EXHIBIT LIST FOR JRP REVIEW
11/1/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL CC: KYLE D EVANS; ASHLYN SMITH; BARBARA URTZ FROM: LANCE LEFFEL SUBJECT: ROWAN V. STATE FARM - DEPO DATES NEEDED FOR ANASAZI. GOODWIN, RAMSEYER, LUTHER - SUBPOENA NEEDED?
11/1/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL CC: KYLE EVANS, ASHLYN SMITH, BARBARA URTZ FROM ATTORNEY JRP SUBJECT - REACH OUT TO OBTAIN DATES - PLAINTIFF INTEREST RECONVENE
11/1/2021	0.60	JRP	RECEIVE, REVIEW, AND DRAFT RESPONSE IN EMAIL THREAD (3 EMAILS) TO: CLIENT MELINDA ROWAN CC: BARBARA URTZ FROM: ATTORNEY JRP - SUBJECT: LUTHER REPORT ATTACHED
11/1/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM ASHLYN SMITH CC BARBARA URTZ; DEBBIE AGNEW CC: LANCE LEFFEL; KYLE EVANS; KARI CYRS; LORI FENEMORE SUBJECT RE: ROWAN V. STATE FARM FINAL WE LIST
11/1/2021	1.00	JRP	EMAIL RECEIVED AND REVIEWED FROM BAU WITH ATTACHMENT - TO: LANCE LEFFEL; KYLE D. EVANS; KARY CYRS; ASHLYN SMITH CC: ATTORNEY JRP; DEBBIE AGNEW FROM BARBARA URTZ SUBJECT: P FINAL W/E LIST
11/3/2021	1.20	JRP	EMAIL THREAD (5 EMAILS)- BETWEEN LEL/MF/JRP TO: ATTORNEY JRP; LANCE LEFFEL CC: KYLE D. EVANS; BARBARA URTZ - FROM: MATTHEW FELTY RE: ROWAN V. STATE FARM - UNOPPOSED APPLICATION TO EXTEND DEADLINE
11/4/2021	0.40	JRP	REVIEW RIMKUS UNOPPOSED EXTENSION OF TIME TO RESPOND TO MTC
11/8/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL - CC: KYLE D EVANS; ASHLYN SMITH; BARBARA URTZ FROM: LANCE LEFFEL SUBJECT: ROWAN V. STATE FARM - WITNESS EXHIBIT LIST
11/9/2021	0.60	JRP	RECEIVED, REVIEWED, AND DRAFTED EMAIL THREAD BETWEEN (3 EMAILS) TO: LANCE LEFFEL CC: KYLE D. EVANS; ASHLYN SMITH; BARBARA URTZ FROM: ATTORNEY JRP SUBJECT: RE: ROWAN V. STATE FARM - MARCH DATES PTC PER BALIFF

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
11/10/2021	0.20	JRP	RECEIVED EMAIL FROM ATTORNEY LANCE LEFFEL REGARDING LATE RESPONSE ON DEPO DATES CC: KYLE D. EVANS; ASHLYN SMITH; BARBARA URTZ FROM: LANCE LEFFEL SUBJECT: RE: ROWAN V. STATE FARM - MARCH DATE DEPO PREFERRED.
11/11/2021	0.40	JRP	REVIEW RESPOND AND DRAFT EMAILS REGARDING CHAT EMAIL THREAD (2 EMAILS) BETWEEN LANCE LEFFEL AND ATTORNEY JRP TO: ATTORNEY JRP CC: BARBARA URTZ; ASHLYN SMITH; KYLE D EVANS FROM: LANCE LEFFEL SUBJECT: RE: DEPO AT 1PM - CHAT DATE
11/11/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL CC: KYLE D. EVANS; ASHLYN SMITH; BARBARA URTZ FROM: ATTORNEY JRP SUBJECT: RE: ROWAN V. STATE FARM - CALL TO WORK OUT
11/12/2021	0.60	JRP	EMAILS RECEIVED, REVIEWED, AND RESPONDED FROM LANCE LEFFEL AND BETWEEN JRP AND LEL IN EMAIL THREAD (3 EMAILS) BETWEEN JRP LEL TO: ATTORNEY JRP CC: KYLE D. EVANS; ASHLYN SMITH; BARBARA URTZ FROM: LANCE LEFFEL SUBJECT: RE: ROWAN V. SFFCC - PTC
11/15/2021	0.20	JRP	REVIEW ORDER GRANTING RIMKUS EXTENSION OF TIME
11/15/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL & ATTACHMENT FROM MATTHEW FELTY, AT LS FIRM -- ; LANCE LEFFEL CC: BARBARA URTZ ; KYLE EVANS SUBJECT: ORDER GRANTING APP FOR EXTENSION OF TIME FILE STAMPED
11/15/2021	0.60	JRP	RECEIVED AND REVIEWED EMAILS IN EMAIL THREAD (3 EMAILS) BETWEEN ATTORNEY JRP AND LANCE LEFFEL TO: LANCE LEFFEL CC: BARBARA URTZ FROM: ATTORNEY JRP SUBJECT - RE: ROWAN EXTENSION REQUEST
11/16/2021	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL AND STAFF RE ROWAN KARI CYRS, L JOHNSTON, ASHLEY @ INSTASCRIPT FROM: REMOTE COUNSEL SUBJECT - SCHEDULED DEPO RAMSEYER
11/16/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL REGGIE WHITTEN; MICHAEL BURRAGE; ATTORNEY JRP FROM: KARI CYRS SUBJECT: SCHEDULED DEPO RAMSEYER
11/16/2021	1.80	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO EMAILS IN EMAIL THREAD (9 EMAILS) BETWEEN JRP/LEL/BAU/KARI CYRS TO: ATTORNEY JRP CC: BAU/KC FROM: LANCE LEFFEL SUBJECT: RE: ROWAN - DEPO DATE DISCUSSION RE: LUTHER & RAMSEYER
11/16/2021	1.40	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO EMAILS IN EMAIL THREAD (7 EMAILS) BETWEEN ATTORNEY JRP;



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
			LANCE LEFFEL; BARBARA URTZ TO: LANCE LEFFEL CC: BARBARA URTZ : ATTORNEY JRP SUBJECT RE: ROWAN GOODWIN/LUTHER/RAMSEYER DEPO DATES/TIMES
11/16/2021	0.20	JRP	EMAIL TO DIANE LUTHER RE DEPOSITION VIA ZOOM ON DEC 14
11/18/2021	4.80	AED	PREPARE PS RESPONSE TO SF MPO RE CORP REP DEPOSITION
11/18/2021	1.60	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENTS FROM BAU TO LANCE LEFFEL, KARI CRYST; ASHLYN SMITH OPPOSING COUNSEL CC JRP AND DEBBIE AGNEW RE ROWAN RESPONSE ATTACHED
11/18/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENTS FROM BAU TO LANCE LEFFEL; KARI CYRS; ASHLYN SMITH; CC: ATTORNEY JRP; DEBBIE AGNEW SUBJECT: FILE STAMPED SF MPO
11/18/2021	1.90	BAU	REVIEW, CHECK CITES/QUOTES, AND FINALIZE RESPONSE TO STATE FARM'S OBJECTION TO NOTICE OF DEPOSITION AND MOTION FOR PROTECTIVE ORDER
11/22/2021	1.00	JRP	EMAIL THREAD (5 EMAILS) BETWEEN LEL/JRP/ JUDGE ANDREWS/BALIFF ETC TO: LANCE LEFFEL FROM: CC: GINNA WILLARD, REGGIE WHITTEN, MICHAEL BURRAGE; JAKE KRATTIGER; JUDGE DON ANDREWS; LEE HINDS; BARBARA URTZ FROM ATTORNEY JRP SUBJECT: RE: CJ 2017-7301 SFFC - ZOOM DATES AGREEMENT FOR PLAINTIFF
11/30/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM COUNSEL; LANCE LEFFEL CC: GINNA WILLARD; REGGIE WHITTEN; MICHAEL BURRAGE; JAKE KRATTIGER; JUDGE ANDREWS; LEE HINDS SUBJECT: RE: ROWAN - ZOOM LINK & CALENDER INVITE FOR DATES
12/1/2021	2.20	JRP	PREPARE FOR AND ATTEND STATUS CONFERENCE
12/1/2021	0.60	JRP	DRAFT, RECEIVED, AND REVIEWED EMAILS IN EMAIL THREAD (3 EMAILS) BETWEEN BAU/LEL/JRP/RNW/MB/JUDGE ANDREWS/ LEE HINDS BALIFF ETC TO: LANCE LEFFEL FROM: GINNA WILLARD, SUBJECT: RE: CJ 2017-7301 SFFC - PRETRIAL CONFERENCE
12/8/2021	0.40	JRP	CALL TO JIM GENDILL RE: PREP FOR FRIDAY'S DEPO
12/9/2021	1.60	JRP	ANALYZE DOCS PRODUCED BY ADVANTAGE PLUS INSPECTION PER SF SDT
12/10/2021	3.00	JRP	PREPARE FOR AND ATTEND DEPOSITION OF JIM GENDILL
12/13/2021	1.00	JRP	EMAILS WITH OPPOSING COUNSEL RE DIANE LUTHER DEPOSITION

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
12/13/2021	0.30	BAU	PREPARATION OF SUPPLEMENTAL DOCUMENT PRODUCTION; EMAIL TO OPPOSING COUNSEL WITH DOCUMENT PRODUCTION
12/14/2021	4.20	JRP	PREPARE FOR AND ATTEND DIANE LUTHER DEPOSITION
12/14/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL; CC BAU, KARI CYS RE: : SCHEDULED: DEPOSITION OF DR. RAMSEYER IN ROWAN V. STATE FARM
12/14/2021	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL IN RESPONSE TO MPSJ, DOI, BLANK PAPERS NO EXHIBITS
12/14/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL SUBJECT:DIAN LUTHER RE - COPY OF PTC REQUEST
12/14/2021	0.20	JRP	DRAFTED AND SENT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL CC: BARBARA URTZ FROM: ATTORNEY JRP SUBJECT: RE: \$625.00 LUTHER W9 INVOICE
12/14/2021	0.20	JRP	DRAFT EMAIL TO BAU RE: SUBJECT: FWD: DIANE LUTHER PRINT MPSJ DOI
12/14/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL, LANCE LEFFEL; KARI CYRS CC BAU RE: ROWAN - LUTHOR DEPOSITION PAYMENT PER RULES.
12/15/2021	3.00	JRP	PREPARE FOR DEPOSITION OF CHRIS RAMSEYER
12/15/2021	0.30	BAU	PREPARATION OF SUPPLEMENTAL DOCUMENT PRODUCTION; EMAIL TO OPPOSING COUNSEL WITH DOCUMENT PRODUCTION
12/16/2021	4.00	JRP	PREPARE FOR AND ATTEND CHRIS RAMSEYER DEPO
12/16/2021	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL, LANCE LEFFEL; KARI CYRS CC BAU RE: ZOOM DEPO INFORMATION
12/20/2021	0.20	JRP	LETTER TO DIANE LUTHER WITH CHECK FROM STATE FARM FOR HER DEPOSITION FEE
12/21/2021	2.60	JRP	REVIEW RIMKUS' RESPONSE TO OUR MTC RIMKUS SDT DOCS AND ATTACHED AFFIDAVIT
12/21/2021	2.20	JRP	RESEARCH CASES CITED BY RIMKUS IN ITS RESPONSE TO PS MTC RIMKUS SDT DOCS
1/4/2022	0.20	JRP	DRAFTED EMAIL TO OPPOSING COUNSEL : LANCE LEFFEL CC: BARBARA URTZ FROM ATTORNEY JRP SUBJECT: GOODWIN DEPO DATES REQUESTED

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
1/10/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU CC JRP - TO: DIANE LUTHER - CC: ATTORNEY JRP FROM BABARA URTZ - SUBJECT: ROWAN V. STATE FARM - YOUR DEPOSITION - 2 DEPO TRANSCRIPTS ATTACHED
1/11/2022	0.40	JRP	RECEIVED AND REVIEWED EMAIL AND LETTER - FROM JIM GENDILL PE SUBJECT - DEPOSITION FEE \$317.50
1/11/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU TO JRP AND DR. RAMSEYER-SUBJECT - DEPOSITION TRANSCRIPT - PLEASE REVIEW 2 DEPO TRANSX ATTACHED
1/18/2022	0.80	JRP	REVIEW SF REPLY TO RESPONSE TO MPO CORP REP DEPOSITION
1/25/2022	3.60	JRP	PREPARE FOR AND ATTEND HEARING ON SF'S OBJECTION AND MOTION FOR PROTECTIVE ORDER RE: OUR NOTICE OF DEPO OF STATE FARM'S CORP REP
1/27/2022	2.20	AED	DRAFT PS REPLY TO RESPONSE TO MTC RIMKUS
1/27/2022	1.30	BAU	REVIEW, CHECK CITES/QUOTES, AND FINALIZE REPLY TO MOTION TO COMPEL RIMKUS COMPLIANCE WITH SUBPOENA DUCES TECUM, INCLUDING PREPARATION OF EXHIBITS
2/7/2022	1.40	JRP	RECEIVED, REVIEWED AND DRAFTED RESPONSE EMAILS (7 EMAILS) TO EMAIL THREAD FROM GINNA WILLARD BETWEEN OPPOSING COUNSEL, WB LS.MATTHEW FELTY; ATTORNEY JRP; MICHAEL BURRAGE; REGGIE WHITTEN ; LANCE LEFFEL; JAKE KRATTIGER; ASHLYN SMITH; JONATHAN BARR; BARBARA URTZ; CC: DON ANDREWS; LEE HINDS -FEB 3 2022 MOTION DOCKET
2/7/2022	0.80	JRP	DRAFTED RESPONSES AND RECEIVED/REVIEWED EMAILS RECEIVED IN EMAIL THREAD (4 EMAILS) BETWEEN ATTORNEY JRP; GINNA WILLARD; MICHAEL BURRAGE; REGGIE WHITTEN; LANCE LEFFEL; JAKE KRATTIGER; ASHLYN SMITH' JONATHAN BARR; BARBARA URTZ; CC: DON ANDREWS ; LEE HINDS FROM: MATTHEW K. FELTY SUBJECT: MOTION DOCKET DATES/CONFLICTS CLEARED
2/7/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OC MATTHEW FELTY REGARDING AVAILABILITY TO: GINA WILLARD;ATTORNEY JRP; MICHAEL BURRAGE; REGGIE WHITTEN; LANCE LEFFEL; JAKE KRATTIGER; ASHLYN SMITH' JONATHAN BARR; BARBARA URTZ; CC: DON ANDREWS ; LEE HINDS FROM: MATTHEW K. FELTY SUBJECT: DOCKET RESCHEDULING
2/7/2022	0.20	JRP	DRAFT EMAIL TO BAU REGARDING EMAIL FROM MATTHEW FELTY, RIMKUS COUNSEL REGARDING ROWAN V. STATE FARM DEPO DATES

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
2/7/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM MATTHEW FELTY - TO LANCE LEFFEL ATTORNEY JRP SUBJECT: ROWAN V. STATE FARM - ASK P MOTION TO BE SET AGREEABLE/OBJECTIONS
2/7/2022	0.20	JRP	DRAFT EMAIL TO OC LANCE LEFFEL MATTHEW FELTY RE: P MOTION DATES
2/8/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM SECRETARY- BAILIFF, GINNA WILLARD FROM JUDGE DON ANDREWS REGARDING MOTION SET FOR 02/10
2/10/2022	3.80	JRP	PREPARE FOR AND ATTEND HEARING ON OUR MTC RIMKUS SDT DOCS (JUDGE ANDREWS)
2/16/2022	0.40	JRP	RECEIPT AND REVIEW OF PROPOSED JOURNAL ENTRY RE 1/25/21 HEARING ON STATE FARM'S OBJECTION TO NOTICE OF DEPOSITION AND MOTION FOR PROTECTIVE ORDER
2/25/2022	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL - TO: LANCE LEFFEL CC: BARBARA URTZ SUBJECT: ROWAN RE: RAMSEYER INVOICE & GOODWIN DEPO REQUEST RESCHEDULE
3/1/2022	0.60	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES IN EMAIL AND ATTACHMENTS IN EMAIL THREAD (3 EMAILS) (1 ATTACHMENT) BETWEEN JRP/LEL/BAU CC: BARBARA URTZ FROM: LANCE LEFFEL SUBJECT: GOODWIN DEPO RESCHEDULE WORKS
3/8/2022	0.20	JRP	DRAFT EMAIL - TO: LANCE LEFFEL; MATTHEW FELTY CC: BARBARA URTZ - TIMEFRAME REQUEST DOC PRODUCTION
3/8/2022	0.60	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL OPC REGARDING SCHEDULING REP DEPOSITION IN THE FUTURE WITH 7 TOPICS REQUESTED FOR AFFIRMATION/DEPOS NEEDED
3/9/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM: MATTHEW FELTY - SUBJECT: RE: ROWAN - WORKING ON LOGISTICAL ISSUES
3/14/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL CC: BAU RE: ROWAN - LATE MAY OR JUNE SCHEDULING?
3/16/2022	0.20	JRP	DRAFT EMAIL TO OPPOSING COUNSEL LANCE LEFFEL CC: BARBARA URTZ SUBJECT: RE: ROWAN - PICK ONE OF TWO DATES
3/24/2022	0.60	JRP	EMAIL THREAD (3 EMAILS) BETWEEN MF LL JRP TO: MATTHEW FELTY; LANCE LEFFEL CC: BARBARA URTZ FROM: ATTORNEY JRP SUBJECT RE: ROWAN V. SF - FOLLOW UP ON UPDATE FOR DATES

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
3/29/2022	0.80	JRP	PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL W/ LANCE LEFFEL RE: CORP REP DEPO TOPICS
3/29/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL CC: BARBARA URTZ SUBJECT - CALL CONFIRMATION RE: ROWAN
3/31/2022	1.20	JRP	RECEIVE, REVIEW, AND DRAFT RESPONSES TO EMAIL IN EMAIL THREAD (6 EMAILS) BETWEEN JRP/LL/MF TO: ATTORNEY JRP ; LANCE LEFFEL CC: BARBARA URTZ SUBJECT: RE: ROWAN LETTER AGREEMENT REGARDING SCOPE OF P/O
4/6/2022	0.40	JRP	RECEIVE, REVIEW AND DRAFT RESPONSES TO EMAIL IN EMAIL THREAD (2 EMAILS) BETWEEN JRP/LL/MF TO: LANCE LEFFEL; REVELL PARRISH CC: BARBARA URTZ SUBJECT: RE: ROWAN - SOMEONE DRAFT PO PLEASE
4/11/2022	0.40	JRP	RECEIVE, REVIEW AND DRAFT RESPONSES TO EMAIL IN EMAIL THREAD (2 EMAILS) BETWEEN MF/JRP/LL TO: ATTORNEY JRP CC: BARBARA URTZ; LANCE LEFFEL SUBJECT - RE: ROWAN V. SF SEND WORD VERSION P/O PLEASE
4/13/2022	0.80	JRP	RECEIVED AND REVIEWED EMAIL AND ATTACHMENT FROM OPPOSING COUNSEL LANCE LEFFEL TO JRP AND MATTHEW FELTY CC: BARBARA URTZ SUBJECT: ROWAN PROTECTIVE ORDER DRAFT
4/14/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL RE SUBJECT: RE: ROWAN V. SF - CONFLICTS W/ CORPORATE REP. NEW DATES NEEDED
4/15/2022	2.20	JRP	RECEIVED, REVIEWED AND DRAFTED EMAILS IN EMAIL THREAD (10 EMAILS) BETWEEN JRP/LEL/BAU/KARI CYRS / BAU TO: ATTORNEY JRP CC: BAU/KC FROM: LANCE LEFFEL SUBJECT: RE: ROWAN V. SF MAY 30 DEPO REPS
4/15/2022	0.20	JRP	RECEIVED AND REVEIWED EMAIL FROM OPPOSING COUNSEL LANCE LEFFEL CC: BARBARA URTZ FROM: LANCE LEFFEL SUBJECT: RE: ROWAN V. SF CORPORATE REP TAYLOR
4/18/2022	0.20	JRP	DRAFTED EMAIL TO RIMKUS COUNSEL AND OPPOSING COUNSEL MATHEW FELTY ; LANCE LEFFEL CC: BARBARA URTZ FROM ATTORNEY JRP SUBJECT: RE: ROWAN V. SF EDITS ON CLIENT APPROVAL
4/20/2022	3.20	JRP	PREPARE FOR AND ATTEND ROBBIE GOODWIN DEPOSITION
4/20/2022	0.80	JRP	RECEIVED, REVIEWED, AND DRAFT RESPONSES TO EMAILS WITHIN EMAIL THREAD BETWEEN MATTHEW FELTY, RIMKUS COUNSEL, LANCE LEFFEL - OPPOSING COUNSEL RE UPDATES

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
			ON REVISED PROTECTIVE ORDERS AND COB UPDATES (4 EMAILS)
4/22/2022	0.40	JRP	DRAFT EMAIL TO CLIENT MR REGARDING GOODWIN DEPOSITION WITH CASE UPDATES
4/22/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM CLIENT MR REQUESTING CASE UPDATES AND TRIAL DEPO DATES
5/23/2022	0.40	JRP	REVIEW AND REVISE FINAL WITNESS AND EXHIBIT LIST
5/23/2022	1.00	BAU	PREPARATION OF FINAL WITNESS AND EXHIBIT LIST FOR JRP REVIEW
5/24/2022	0.50	JRP	REVIEW SF FINAL W/E LIST
5/24/2022	0.20	JRP	DRAFT EMAIL TO RIMKUS AND SF OPPOSING COUNSEL - TO: MATTHEW FELTY; LANCE LEFFEL CC BARBARA URTZ - SUBJECT - FOLLOWING UP ON PO - WILL TAKE OVER TO JUDGE FOR SIG. DOC PRODUCTION STILL NEEDED
5/26/2022	0.80	JRP	DRAFT RESPONSES TO EMAILS IN EMAIL THREAD (4 EMAILS ) RECEIVED AND REVIEWED BETWEEN LL JRP MF TO: LANCE LEFFEL CC: MATTHEW FELTY BARBARA URTZ - FROM: ATTORNEY JRP SUBJECT: RE: ROWAN V. SF GET DOC. IN BEFORE HOLIDAY
5/27/2022	2.80	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENTS (2 ATTACHMENTS, 25 PAGES) FROM ASHLYN SMITH CC: BARBARA URTZ LANCE LEFFEL; KARI CYRS RE: ROWAN V. STATE FARM - JE SF OBJ. AND MPO / HEARING TRANSCRIPT
5/31/2022	0.40	JRP	REVIEW RIMKUS/SF ASSIGNMENT PAYMENTS
5/31/2022	2.40	JRP	PREPARE FOR DEPOSITION OF STATE FARM CORP REP.
6/1/2022	7.60	JRP	PREPARE FOR DEPOSITION OF STATE FARM CORP REP.
6/1/2022	0.20	JRP	EMAIL - TO: ATTORNEY JRP CC: BARBARA URTZ, LANCE LEFFEL KARI CYRS FROM: ASHLYN SMITH SUBJECT: FOLLOW UP ON PROPOSED JE
6/1/2022	1.70	BAU	PREPARATION OF EXHIBITS FOR DEPOSITION OF JASON TAYLOR
6/2/2022	5.00	JRP	PREPARE FOR AND TAKE DEPOSITION OF STATE FARM CORP REP.
6/3/2022	0.60	JRP	RECEIVED, REVIEWED AND DRAFTED RESPONSES TO EMAILS IN EMAIL THREAD (3 EMAILS) BETWEEN MF/JRP/BAU/LL TO: MATTHEW FELTY; BARBARA URTZ CC LANCE LEFFEL FROM ATTORNEY JRP SUBJECT: PAUSE MOTION TO ENFORCE



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
6/3/2022	0.20	JRP	DRAFT EMAIL TO SEND TO BAU REGARDING MATTHEW FELTY REQUEST TO CALL REGARDING ROWAN
6/3/2022	0.20	JRP	DRAFT EMAIL TO RIMKUS OPC MATTHEW FELTY CC LANCE LEFFEL RE REGARDING MOTION TO ENFORCE FOR REPORTS
6/3/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM RIMKUS OPC MATTHEW FELTY REGARDING REQUEST FOR CALL ON ROWAN REGARDING ROWAN REPORTS
6/7/2022	0.20	JRP	DRAFTED RESPONSE EMAIL WITH PROPOSED JE ATTACHED TO ASHLYN SMITH CC: BARBARA URTZ ; LANCE LEFFEL: KARI CYRS SUBJECT: REDLINE VERSION PRPOSED JE ATTACHED
6/7/2022	0.40	JRP	RECEIVED AND REVIEWED EMAIL FROM: ASHLYN SMITH REGARDING DEPOSITION HIGHLIGHTS IN EMAIL CC: BARBARA URTZ, LANCE LEFFEL KARI CYRS SUBJECT: STRIK NO2 NOT 1
6/7/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM: ASHLYN SMITH CC: BARBARA URTZ, LANCE LEFFEL KARI CYRS FROM: ASHLYN SMITH SUBJECT: SIG PAGE REQUESTED
6/10/2022	0.80	JRP	PREPARE JE SF CORP REP DEPOSITION
6/13/2022	1.20	AED	PREPARE PS MOTION TO ENFORCE SDT TO RIMKUS
6/13/2022	0.70	JRP	REVIEW AND REVISE MOTION TO ENFORCE RIMKUS COMPLIANCE WITH SUBPOENA DUCES TECUM
6/15/2022	1.50	AED	DRAFT PRETRIAL CONFERENCE ORDER FOR JRP REVIEW
6/16/2022	1.20	JRP	REVIEW AND REVISE PRETRIAL CONFERENCE ORDER
6/16/2022	0.30	AED	REVIEW AND REVISE PRETRIAL CONFERENCE ORDER
6/17/2022	0.20	JRP	EMAIL TO OPPOSING COUNSEL WITH PROPOSED PRETRIAL CONFERENCE ORDER
6/20/2022	1.50	BAU	WORK ON EXHIBIT LIST FOR PRETRIAL CONFERENCE ORDER: REVIEW AND REVISE PRETRIAL CONFERENCE ORDER
6/21/2022	0.40	JRP	EMAIL TO OPPOSING COUNSEL WITH PROPOSED PRETRIAL CONFERENCE ORDER
6/21/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OPPOSING COUNSEL WITH REVISED PRETRIAL ORDER
6/21/2022	0.80	JRP	REVIEW AND REVISE PRETRIAL CONFERENCE ORDER
6/21/2022	0.60	JRP	EMAILS WITH OPPOSING COUNSEL RE REVISED PRETRIAL CONFERENCE ORDER

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
6/22/2022	3.40	JRP	PREPARE FOR AND ATTEND PRETRIAL CONFERENCE
6/30/2022	0.20	JRP	REVIEW RIMKUS UNOPPOSED EXTENSION TO RESPOND TO PLAINTIFFS' MOTION TO ENFORCE COMPLIANCE
6/30/2022	0.20	JRP	EMAILS WITH COUNSEL FOR RIMKUS AND STATE FARM RE RIMKUS' REQUEST FOR ADDITIONAL TIME TO RESPOND TO PLAINTIFFS' MOTION TO ENFORCE
6/30/2022	0.80	JRP	RECEIVED REVIEWED AND DRAFTED EMAIL IN THREAD (4 EMAILS) BETWEEN JRP/LEL/MKF TO: ATTORNEY JRP; LANCE LEFFEL CC: JONATHAN BARR; BARBARA URTZ - FROM: MATTHEW FELTY - SUBJECT: RE: ROWAN V. SF - RCG APP FOR EXT. TO RESP. TO MTE
6/30/2022	0.20	JRP	DRAFT EMAIL TO BAU REGARDING ATTACHMENT OF UNOPP APP OF EXT TIME SUBJECT: FW: ROWAN V. SF APP EXTENSION
6/30/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM MATTHEW FELTY, RIMKUS COUNSEL TO JRP AND OC LANCE LEFFEL CC: JONATHAN BARR SUBJECT: ROWAN V. SF - RCG APP OPPOSITION - ATTACHMENT MTE
7/7/2022	0.20	JRP	RECEIPT AND REVIEW ORDER GRANTING RIMKUS REQUEST FOR ADDITIONAL TIME TO RESPOND TO MOTION TO ENFORCE
7/8/2022	0.30	JRP	EMAIL TO COUNSEL FOR RIMKUS AND STATE FARM RE PLAINTIFFS' MOTION TO ENFORCE IS SPECIALLY SET ON JULY 19
7/14/2022	8.00	AED	WORK ON DEPOSITION DESIGNATIONS RE MARK WESLEY AND JACK BUBEN
7/14/2022	1.00	JRP	REVIEW RIMKUS RESPONSE TO MTN TO ENFORCE
7/15/2022	1.40	JRP	RECEIVE AND REVIEW RIMKUS RESPONSE TO OUR MOTION TO ENFORCE COMPLIANCE W/ SDT
7/15/2022	8.00	AED	WORK ON DEPOSITION DESIGNATIONS RE MARK WESLEY AND MARK LEATHERS
7/18/2022	6.40	AED	WORK ON DEPOSITION DESIGNATIONS RE JASON TAYLOR
7/18/2022	6.00	BAU	WORK ON TRIAL EXHIBITS
7/19/2022	3.50	AED	WORK ON DEPOSITION DESIGNATIONS RE JASON TAYLOR
7/19/2022	3.00	JRP	PREPARE FOR AND ATTEND HEARING ON OUR MTN TO ENFORCE RIMKUS COMPLIANCE WITH SDT
7/19/2022	2.10	BAU	WORK ON TRIAL EXHIBITS



<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
7/20/2022	1.60	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES IN EMAILS RECEIVED FROM LANCE LEFFEL - EMAIL THREAD (8 EMAILS) BETWEEN JRP BAU LEL CC: BARBARA URTZ FROM: LANCE LEFFEL SUBJECT: DATES RE: ROWAN OTC MEDIATION ATTEMPT
7/20/2022	0.20	JRP	DRAFT EMAIL - TO: CLIENT MELINDA ROWAN CC: BARBARA URTZ - SUBJECT: MEDIATION EMAILS FROM LANCE
7/20/2022	1.60	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES IN EMAILS RECEIVED FROM NATIONAL ASSOCIATION OF DISTINGUISHED NEUTRALS, MONICA REY REGARDING MEDIATION APPOINTMENT DATES IN EMAILS FROM - EMAIL THREAD (8 EMAILS) BETWEENMR/KC/LEL/JRP SUBJECT: DATES RE: ROWAN OTC MEDIATION ATTEMPT
7/20/2022	1.20	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES IN EMAILS FROM EMAIL THREAD (6 EMAILS) BETWEEN J. REVELL PARRISH, LANCE LEFFEL; CC: BARBARA URTZ; KARI CYRS SUBJECT: DRC LOCATION FOR MED
7/20/2022	2.10	BAU	WORK ON TRIAL EXHIBITS
7/21/2022	1.60	JRP	RECEIPT AND REVIEW SF MOTION TO RECONSIDER 7/19 ORDER
7/21/2022	5.00	BAU	WORK ON TRIAL EXHIBITS AND DEMONSTRATIVES
7/22/2022	4.20	BAU	WORK ON TRIAL EXHIBITS AND DEMONSTRATIVES
7/25/2022	5.00	BAU	WORK ON TRIAL EXHIBITS AND DEMONSTRATIVES
7/26/2022	7.20	JRP	PREPARE AND SUBMIT PLAINTIFFS' MEDIATION STATEMENT
7/26/2022	1.00	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSE EMAILS IN EMAIL THREAD - (5 EMAILS) BETWEEN JRP/LEL/BAU/KC TO: ATTORNEY JRP CC: KARI CYRS; BARBARA URTZ FROM: LANCE LEFFEL - SUBJECT: RE: ROWAN REDOCKET DATES
7/26/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL WITH ATTACHMENT FROM: BARBARA URTZ REGARDING SUBJECT: ROWAN V. STATE FARM 12 OS 2408 MEDIATION STATEMENT
7/26/2022	0.80	JRP	RECEIVED AND REVIEWED EMAIL FROM BAU TO ATTORNEY JRP AND JAMES GIBBS, MONICA REGGIE WHITTEN; MCHAEEL BURRAGE SUBJECT: MEDIATION STATEMENT AND CONFIRMATION DATE
7/26/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL FROM OC RIMKUS COUNSEL MATTHEW FELTY TO JRP AND LANCE LEFFEL REQUESTING VOLUNTARY RESCHEDULE HEARING

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
7/26/2022	0.80	JRP	RECEIVED REVIEWED AND DRAFTED EMAILS REGARDING ROWAN TRIAL EXHIBITS IN EMAIL THREAD (4 EMAILS) BETWEEN LANCE LEFFEL, REVELL PARRISH, ASHLYN SMITH, BARBARA URTZ, KARI CYRS, AND JANET L WRIGHT
7/26/2022	1.60	BAU	REVIEW, REVISE AND FINALIZE MEDIATION STATEMENT; PREPARATION OF EXHIBITS TO MEDIATION STATEMENT; EMAIL TO MEDIATOR
7/27/2022	9.40	AED	PREPARE PLAINTIFFS' DEPOSITION DESIGNATIONS
7/27/2022	2.00	JRP	RECEIVED, REVIEWED, AND DRAFTED EMAILS FROM EMAIL THREAD (10 EMAILS) BETWEEN LANCE LEFFEL, MATTHEW FELTY, REVELL PARRISH; CC BAU DISCUSSING AGREEMENT DATES FOR HEARING
7/28/2022	1.60	JRP	MEET WITH AED AND DISCUSS PS MOTIONS IN LIMINE
7/29/2022	3.80	AED	DRAFT PS MOTION IN LIMINES 1-5
7/29/2022	2.00	AED	PREPARE PS RESPONSE TO SF MOTION TO RECONSIDER
7/29/2022	2.50	BAU	WORK ON DEPOSITION DESIGNATIONS
7/29/2022	2.00	BAU	REVIEW, REVISE AND FINALIZE MOTIONS IN LIMINE
8/1/2022	4.00	BAU	BEGIN WORK W/JRP ON DEMONSTRATIVE EXHIBITS
8/1/2022	1.00	JRP	RECEIPT AND REVIEW SF DAUBERT MOTION
8/1/2022	4.00	JRP	BEGIN WORK W/BAU ON DEMONSTRATIVE EXHIBITS
8/1/2022	1.40	JRP	RECEIPT AND REVIEW SF MOTIONS IN LIMINE
8/2/2022	3.60	JRP	CONTINUE WORKING W/BAU ON DEMONSTRATIVE EXHIBITS
8/2/2022	5.20	JRP	PREPARE FOR AND ATTEND MEDIATION W/ JIM GIBBS
8/3/2022	4.60	BAU	CONTINUE WORKING W/JRP ON DEMONSTRATIVE EXHIBITS
8/3/2022	4.60	JRP	CONTINUE WORKING W/BAU ON DEMONSTRATIVE EXHIBITS
8/3/2022	0.60	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSE EMAILS RELATING IN EMAIL THREAD (3 EMAILS) BETWEEN MATTHEW FELTY; LANCE LEFFEL; REVELL PARRISH TSUBJECT: ROWAN STATE FARM HEARING 8/12
8/4/2022	2.80	BAU	WORK W/JRP FINALIZE DEMONSTRATIVE EXHIBITS
8/4/2022	1.40	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSE EMAILS RELATING IN EMAIL THREAD (7 EMAILS) BETWEEN MATTHEW FELTY; LANCE LEFFEL; REVELL PARRISH TO: ATTORNEY JRP AND LANCE LEFFEL FROM: MATTHEW FELTY SUBJECT: EMAILS WITH FELTY RE RIMKUS DEPO ON 08.19

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
8/4/2022	2.80	JRP	WORK W/BAU AND FINALIZE DEMONSTRATIVE EXHIBITS
8/4/2022	1.00	JRP	RECEIVED, REVIEWED, AND DRAFTED RESPONSES TO EMAIL THREAD (5 EMAILS) BETWEEN JRP LL MF TO: ATTORNEY JRP CC: BARBARA URTZ; MATTHEW FELTY FROM: LANCE LEFFEL SUBJECT: EMAILS WITH OPC RE: RIMKUS HEARING - DEPO
8/5/2022	0.10	BAU	DOCKET MOTION TO RECONSIDER HEARING
8/5/2022	1.40	JRP	PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL W/ LANCE LEFFEL AND MATT FELTY RE: MOTION TO VACATE/RECONSIDER HEARING
8/5/2022	0.40	JRP	RECEIVED REVIEWED AND DRAFTED RESPONSES IN EMAIL THREAD (2 EMAILS) BETWEENGINNA WILLARD CC: ATTORNEY JRP; LANCE LEFFEL; JONATHAN BARR FROM: MATHEW FELTY SUBJECT: BAILIFF EML RESET 8.12 HEARING TO 8.18
8/5/2022	0.20	JRP	DRAFT EMAIL TO BAU REGARDING SUBJECT: FELTY TO BAILIFF RE: 8-12 HEARING
8/8/2022	3.80	AED	PREPARE RESPONSE TO SF MTN TO RECONSIDER/VACATE 7-19-22 ORDER
8/9/2022	3.00	AED	RESEARCH LEGAL ISSUES RAISED IN SF MILS
8/11/2022	6.00	AED	DRAFT PS COMBINED RESPONSE TO SF MILS
8/11/2022	4.40	AED	DRAFT PS RESPONSE TO SF DAUBERT
8/11/2022	0.60	BAU	PREPARATION OF APPLICATION TO FILE UNDER SEAL RE RESPONSES TO MOTIONS IN LIMINE AND PROPOSED ORDER
8/11/2022	4.20	BAU	REVIEW, REVISE, CHECK CITES/QUOTES AND FINALIZE RESPONSES TO STATE FARM'S MOTIONS IN LIMINE, INCLUDING PREPARATION FOR FILING UNREDACTED VERSION AND EXHIBITS UNDER SEAL
8/11/2022	2.80	BAU	REVIEW, REVISE, CHECK CITES/QUOTES AND FINALIZE RESPONSE TO STATE FARM'S MOTION TO EXCLUDE CHRIS RAMSEYER AND DIANE LUTHER
8/11/2022	6.00	BAU	WORK ON TRIAL EXHIBITS AND DEMONSTRATIVES
8/15/2022	3.00	BAU	FINALIZE TRIAL EXHIBITS AND PREPARE FOR EXCHANGE
8/15/2022	1.60	JRP	ANALYZE SF COUNTERDESIGNATIONS AND OBJECTIONS TO DEPOSITION
8/15/2022	2.20	JRP	ANALYZE SF COMBINED RESPONSE TO MIL 1-5
8/15/2022	3.70	BAU	REVIEW, REVISE AND FINALIZE OBJECTIONS TO DEFENDANT'S COUNTER DESIGNATIONS

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
8/15/2022	0.30	BAU	EMAIL TO OPPOSING COUNSEL WITH OBJECTION TO COUNTER DESIGNATIONS, AMENDED TRIAL EXHIBIT LIST AND MARKED TRIAL EXHIBITS
8/17/2022	0.20	JRP	RECEIVED EMAIL FROM BAU TO LANCE LEFFEL; ASHLYN SMITH; JAY P. WALTERS; KARI CYRS; JANET L. WRIGHT CC: REGGIE WHITTEN; ATTORNEY JRP SUBJECT: BAU TO OPC WITH HIGHLIGHTED DEPOS
8/17/2022	2.00	JRP	PREPARE FOR DEPOSITION OF JOHNNY PHANTHALA
8/17/2022	7.60	BAU	HIGHLIGHT DEPOSITION TRANSCRIPTS PER DEPO DESIGNATIONS, COUNTER DESIGNATIONS AND OBJECTIONS; EMAIL TO OPPOSING COUNSEL WITH HIGHLIGHTED DEPOSITION TRANSCRIPTS
8/18/2022	4.40	JRP	PREPARE FOR AND ATTEND HEARING ON OBJECTIONS TO DEPO DESIGNATIONS, MILS, DAUBERT MOTIONS, SF MOTION TO RECONSIDER
8/18/2022	3.60	JRP	PREPARE FOR DEPOSITION OF JOHNNY PHANTHALA
8/18/2022	0.30	BAU	RECEIPT AND REVIEW EMAIL FROM MATT FELTY RE CONFIDENTIAL INFORMATION IN PRETRIAL ORDER
8/18/2022	0.50	BAU	PREPARATION OF APPLICATION TO FILE PRETRIAL CONFERENCE ORDER UNDER SEAL AND PROPOSED ORDER
8/18/2022	6.00	BAU	WORK ON DEMONSTRATIVES
8/18/2018	0.80	BAU	WORK ON TRIAL SUBPOENA TO MARK LEATHERS; ARRANGE FOR PERSONAL SERVICE BY PRIVATE PROCESS SERVER
8/19/2022	3.00	JRP	PREPARE FOR AND TAKE DEPOSITION OF JOHNNY PHANTHALA
8/19/2022	8.00	BAU	WORK ON DEMONSTRATIVES
8/19/2022	1.00	BAU	PREPARATION OF EXHIBITS FOR DEPOSITION OF JOHNNY PHANTHALA
8/19/2022	0.60	BAU	TELECONFERENCES WITH PROCESS SERVER RE EFFORTS TO SERVE MARK LEATHERS WITH TRIAL SUBPOENA; ARRANGE FOR PERSONAL SERVICE BY SHERIFF
8/20/2022	7.00	BAU	WORK ON DEMONSTRATIVES
8/20/2022	10.00	JRP	PREPARE FOR TRIAL
8/21/2022	10.00	JRP	PREPARE FOR TRIAL
8/21/2022	0.80	BAU	PREPARATION OF TRIAL SUBPOENAS TO JACK BUBEN, MARK WESLEY AND JASON TAYLOR

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
8/22/2022	6.00	AED	BEGIN WORK ON PS PROPOSED JURY INSTRUCTIONS
8/22/2022	12.00	JRP	PREPARE FOR TRIAL
8/22/2022	10.00	BAU	WORK ON DEMONSTRATIVES
8/23/2022	4.00	JRP	MEET WITH RNW RE TRIAL STRATEGY
8/23/2022	6.00	JRP	PREPARE FOR TRIAL
8/23/2022	4.00	RNW	MEET WITH JRP RE TRIAL STRATEGY
8/23/2022	8.00	AED	WORK ON PROPOSED JURY INSTRUCTIONS
8/23/2022	10.00	BAU	WORK ON DEMONSTRATIVES; TRIAL PREP
8/24/2022	1.80	AED	PREPARE RESPONSE TO SF MOTION TO CONTINUE TRIAL
8/24/2022	0.60	JRP	RECEIPT AND REVIEW SF MOTION TO CONTINUE TRIAL
8/24/2022	5.80	JRP	ANALYZE RIMKUS REPORTS PRODUCED BATES 1-1630
8/24/2022	4.00	JRP	REVIEW AND REVISE PROPOSED JURY INSTRUCTIONS
8/24/2022	2.00	BAU	REVIEW, REVISE PROPOSED JURY INSTRUCTIONS
8/24/2022	10.00	BAU	WORK ON DEMONSTRATIVES; TRIAL PREP; EMAIL TO OPPOSING COUNSEL WITH DEMONSTRATIVES
8/24/2022	6.00	JSO	TRIAL PREPARATION
8/25/2022	1.10	BAU	FINALIZE PROPOSED JURY INSTRUCTIONS; EMAIL TO COURT BAILIFF; EMAIL TO OPPOSING COUNSEL
8/25/2022	2.60	JRP	COMPLETE ANALYSIS OF RIMKUS REPORTS PRODUCED BATES 1-1630
8/25/2022	6.40	JRP	PREPARE FOR TRIAL
8/25/2022	3.00	JRP	JRP MEET WITH EXPERT DIANE LUTHER FOR TRIAL PREP
8/25/2022	2.20	JRP	PREPARE FOR AND ATTEND HEARING ON STATE FARM'S MOTION TO CONTINUE TRIAL
8/25/2022	3.40	MB	MEET WITH JRP TO DISCUSS TRIAL STRATEGY
8/25/2022	3.40	RNW	MEET WITH JRP TO DISCUSS TRIAL STRATEGY
8/25/2022	1.00	BAU	ATTEND HEARING ON STATE FARM'S MOTION TO CONTINUE TRIAL
8/25/2022	10.00	BAU	PREPARE FOR TRIAL
8/25/2022	6.00	JSO	TRIAL PREPARATION
8/26/2022	0.20	JRP	REVIEW JE ON 8/18 HEARING

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
8/26/2022	12.00	JRP	PREPARE FOR TRIAL
8/26/2022	0.20	JRP	RECEIVED AND REVIEWED EMAIL BETWEEN BARBARA URTZ AND JANET WRIGHT CC JRP SUBJECT: WRIGHT EMAIL RE: LEATHERS VIDEO
8/26/2022	0.40	JRP	RECEIVED, REVEIWED, AND DRAFTED RESPONSE EMAILS IN EMAIL THREAD (2 EMAILS) BETWEEN ATTORNEY JRP & ASHLYN SMITH TO: ATTORNEY JRP CC: BARBARA URTZ; LANCE LEFFEL; JAY WALTERS JANET WRIGHT FROM: ASHLYN SMITH SUBJECT: STIPULATED EXHIBITS ROWAN
8/26/2022	0.40	JRP	RECEIVED, REVEIWED, AND DRAFTED RESPONSE EMAILS IN EMAIL THREAD (2 EMAILS) BETWEEN JRP, MATTHEW FELTY, LANCE LEFFEL. SUBJECT: EMAILS W/ FELTY RE PHANTHLA AT TRIAL
8/26/2022	17.00	BAU	TRIAL PREPARATION; COURTROOM SET UP; WORK ON CLIPPING VIDEO OF MARK LEATHERS DEPOSITION
8/26/2022	4.40	MB	MEET WITH JRP TO DISCUSS TRIAL STRATEGY
8/26/2022	6.00	RNW	MEET WITH JRP TO DISCUSS TRIAL STRATEGY
8/26/2022	5.00	JSO	TRIAL PREPARATION
8/27/2022	16.00	JRP	PREPARE FOR TRIAL
8/27/2022	15.00	BAU	TRIAL PREPARATION
8/28/2022	16.00	JRP	PREPARE FOR TRIAL
8/28/2022	15.00	BAU	TRIAL PREPARATION; WORK ON CLIPPING VIDEO OF MARK LEATHERS DEPOSITION
8/29/2022	3.20	AED	PREPARATION OF PLAINTIFFS' OBJECTION TO STATE FARM'S PROPOSED JURY INSTRUCTIONS
8/29/2022	16.00	JRP	PREPARE FOR AND ATTEND TRIAL
8/29/2022	1.00	RNW	DISCUSS TRIAL AND STRATEGY W/JRP
8/29/2022	15.00	BAU	TRIAL PREPARATION; ATTEND TRIAL; FINALIZE OBJECTIONS TO STATE FARM'S PROPOSED JURY INSTRUCTIONS
8/29/2022	10.00	JSO	PREPARE FOR AND ATTEND TRIAL
8/30/2022	1.60	JRP	DISCUSS WITH MB SF PROPOSED JURY INSTRUCTIONS
8/30/2022	2.40	JRP	ANALYZE SF PROPOSED JURY INSTRUCTIONS AND COMPARE WITH PLAINTIFFS' PROPOSED JIS
8/30/2022	16.00	JRP	PREPARE FOR AND ATTEND TRIAL

<u>Date</u>	<u>Time</u>	<u>Timekeeper</u>	<u>Description</u>
8/30/2022	4.60	MB	ANALYZE SF PROPOSED JURY INSTRUCTIONS AND COMPARE WITH OUJI
8/30/2022	1.60	MB	DISCUSS WITH JRP SF PROPOSED JURY INSTRUCTIONS
8/30/2022	15.00	BAU	TRIAL PREPARATION; ATTEND TRIAL
8/30/2022	10.00	JSO	PREPARE FOR AND ATTEND TRIAL
8/31/2022	16.00	JRP	PREPARE FOR AND ATTEND TRIAL
8/31/2022	3.80	MB	PREPARE FOR AND ATTEND JURY INSTRUCTION CONFERENCE
8/31/2022	1.20	RNW	DISCUSS TRIAL AND STRATEGY W/JRP
8/31/2022	14.00	BAU	TRIAL PREPARATION; ATTEND TRIAL
8/31/2022	10.00	JSO	PREPARE FOR AND ATTEND TRIAL
9/1/2022	10.00	JRP	PREPARE FOR AND ATTEND TRIAL
9/1/2022	10.00	BAU	TRIAL PREPARATION; ATTEND TRIAL
9/1/2022	8.00	JSO	PREPARE FOR AND ATTEND TRIAL







**OKLAHOMA**  
State Courts Network

The information on this page is NOT an official record. Do not rely on the correctness or completeness of this information. Verify all information with the official record keeper. The information contained in this report is provided in compliance with the Oklahoma Open Records Act, 51 O.S. 24A.1. Use of this information is governed by this act, as well as other applicable state and federal laws.

**IN THE DISTRICT COURT IN AND FOR OKLAHOMA COUNTY, OKLAHOMA**

Jeremy Rowan and  
Melinda Rowan, husband and wife,  
Plaintiff,  
v.  
State Farm Fire & Casualty Company,  
and Brodoc LLC d/b/a Servepro  
Of Edmond,  
Defendant.

**No. CJ-2017-7301**  
**(Civil relief more than \$10,000: BREACH OF AGREEMENT - CONTRACT)**

Filed: 12/28/2017  
Closed: 09/27/2022

Judge: Andrews, Don

**PARTIES**

Brodoc Llc, Defendant  
Rowan, Jeremy, Plaintiff  
Rowan, Melinda, Plaintiff  
State Farm Fire & Casualty Company, Defendant

**ATTORNEYS**

**Attorney**

Grimm, William R (Bar #3628)  
110 W SEVENTH ST, SUITE 900  
TULSA, OK 74119

Leffel, Lance E (Bar #19511)  
ONE LEADERSHIP SQ. 15TH FL.  
211 N. ROBINSON  
OKC, OK 73102

Smith, Ashlyn M. (Bar #34025)  
GableGoatwals  
One Leadership Square, 15th Floor  
211 N. Robinson  
Oklahoma City, OK 73102

Walters, Jay P (Bar #17364)  
499 W. SHERIDAN AVE., SUITE 2200  
OKLAHOMA CITY, OK 73102

Whitten, Reggie (Bar #9576)  
WHITTEN BURRAGE  
512 N BROADWAY AVE  
SUITE 300  
OKLAHOMA CITY, OK 73102

**Represented Parties**

Brodoc Llc,

State Farm Fire & Casualty Company,

State Farm Fire & Casualty Company,

State Farm Fire & Casualty Company,

Rowan, Melinda  
Rowan, Jeremy

**EVENTS**

**Event**

Friday, October 26, 2018 at 10:30 AM  
PLAINTIFFS MOTION TO COMPEL DOCUMENTS FROM DEFENDANT STATE FARM FIRE & CASUALTY CO

Party

Docket Reporter

**EXHIBIT**

**3**

exhibitsticker.com

**12-28-2017 [ACCOUNT]**

RECEIPT # 2017-4271902 ON 12/28/2017.

PAYOR: MCINTYRE LAW P.C. TOTAL AMOUNT PAID: \$ 252.14.

## LINE ITEMS:

CJ-2017-7301: \$183.00 ON AC01 CLERK FEES.

CJ-2017-7301: \$6.00 ON AC23 LAW LIBRARY FEE CIVIL AND CRIMINAL.

CJ-2017-7301: \$1.66 ON AC31 COURT CLERK REVOLVING FUND.

CJ-2017-7301: \$5.00 ON AC58 OKLAHOMA COURT APPOINTED SPECIAL ADVOCATES.

CJ-2017-7301: \$1.55 ON AC59 COUNCIL ON JUDICIAL COMPLAINTS REVOLVING FUND.

CJ-2017-7301: \$7.00 ON AC64 DISPUTE MEDIATION FEES CIVIL ONLY.

CJ-2017-7301: \$0.45 ON AC65 STATE JUDICIAL REVOLVING FUND, INTERPRETER SVCS.

CJ-2017-7301: \$2.48 ON AC67 DISTRICT COURT REVOLVING FUND.

CJ-2017-7301: \$25.00 ON AC79 OCIS REVOLVING FUND.

CJ-2017-7301: \$10.00 ON AC81 LENGTHY TRIAL FUND.

CJ-2017-7301: \$10.00 ON AC88 SHERIFF'S SERVICE FEE FOR COURT HOUSE SECURITY.

**01-29-2018 [A]**

ANSWER OF DEFENDANT STATE FARM FIRE AND CASUALTY CO.

Document Available (#1039202113) ☐ TIFF ☒ PDF**02-02-2018 [NO]**

NOTICE OF FILING NOTICE OF REMOVAL

Document Available (#1039408438) ☐ TIFF ☒ PDF**03-23-2018 [EAA]**

ENTRY OF APPEARANCE

Document Available (#1039182429) ☐ TIFF ☒ PDF**03-26-2018 [MEMO]**

MEMORANDUM OPINION AND ORDER

Document Available (#1039711514) ☐ TIFF ☒ PDF**08-20-2018 [EAA]**

ENTRY OF APPEARANCE

Document Available (#1041114230) ☐ TIFF ☒ PDF**08-20-2018 [JUDG]**

OFFER OF JUDGMENT

Document Available (#1040995605) ☐ TIFF ☒ PDF**09-13-2018 [MO]**

PLAINTIFFS' MOTION TO COMPEL DOCUMENTS FROM DEFENDANT STATE FARM FIRE &amp; CASUALTY COMPANY

Document Available (#1041522870) ☐ TIFF ☒ PDF**10-01-2018 [RESP]**

DEFENDANT STATE FARM FIRE AND CASUALTY'S RESPONSE AND OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL

Document Available (#1041515110) ☐ TIFF ☒ PDF**10-19-2018 [R]**

PLAINTIFFS' REPLY TO DEFENDANT STATE FARM FIRE &amp; CASUALTY CO.'S RESPONSE TO PLAINTIFFS' MOTION TO COMPEL

Document Available (#1041906658) ☐ TIFF ☒ PDF**10-25-2018 [CRF]**

COURT REPORTER FEE-TRIAL ON MERITS

\$ 20.00

**10-25-2018 [ACCOUNT]**

RECEIPT # 2018-4472976 ON 10/25/2018.

PAYOR: GABLEGOTWALS TOTAL AMOUNT PAID: \$ 20.00.

## LINE ITEMS:

CJ-2017-7301: \$20.00 ON AC01 CLERK FEES.

**10-26-2018 [CTFREE]**

JUDGE PARRISH; PLAINTIFFS MOTION TO COMPEL DOCUMENTS FROM DEFENDANT STATE FARM FIRE &amp; CASUALTY - GRANTED AS TO INTERROGATORIES 24-29. BEGINNING IN 2012, DENIED AS TO INTERROGATORIES #30.

COURT REPORTER - APRIL BLOYE

WHITTEN &amp; BURRAGE, LLP OPERATING ACCOUNT

559

DATE	DESCRIPTION	INVOICE #	AMOUNT	CHECK DEDUCTION	NET AMOUNT
Oklahoma County Court Clerk 11/29/2021	Rowan v. State Farm	JURY FEE	349.00		349.00

CHECK DATE	CONTROL NUMBER	TOTALS	Gross:	Ded:	Net:
11/29/2021	5590		349.00	0.00	349.00

**VOID**

WHITTEN & BURRAGE, LLP  
OPERATING ACCOUNT  
1212 N BROADWAY AVE SUITE 300  
OKLAHOMA CITY, OK 73102  
PH: 405-516-7800

FIRST UNITED BANK AND TRUST COMPANY  
00-001031

559

DATE 11/29/2021 CHECK AMOUNT \*\*\*\*\*\$349.00

**PAY** \*\*\* THREE HUNDRED FORTY-NINE & 00/100 DOLLARS

TO THE ORDER Oklahoma County Court Clerk  
OF:

**VOID**

MEMO: Rowan v. State Farm

AUTHORIZED SIGNATURE

⑈005590⑈

WHITTEN &amp; BURRAGE, LLP OPERATING ACCOUNT

5590

Whitten & Burrage, LLP  
512 N. Broadway Avenue, Suite 300  
Oklahoma City, OK 73102  
(405) 516-7800

Tax ID #26-1468767

Jeremy & Melinda Rowan

Page: 1  
10/31/2019  
Account No: 514-0001  
Statement No: 2

Rowan, Jeremy & Melinda v. State Farm F&C Co.

Expenses

1/03/2018	Paid to Oklahoma Insurance Department for service of Summons (130)	20.00
-----------	--------------------------------------------------------------------	-------

Please include account number on check and make check payable to Whitten & Burrage, LLP.

Thank you

**BRYAN SMITH & ASSOCIATES,**

1732 Southwest Blvd. TULSA, OK 74107  
 OFFICE: 918-582-5353 TOLL FREE: 800-528-2724  
 FAX: 918-582-0861 EMAIL: BSAI799@AOL.COM

**INVOICE**

**To: BARBARA URTZ**  
**WHITTEN BURRAG**  
**512 N. BROADWAY AVE., SUITE 300**  
**OKLAHOMA CITY, OK 73102**

Client #: 1

Your Reference #

In Re: JEFFREY MARK WESLEY

**Service Address: 13830 E 91ST STREET N**  
**OWASSO, OK 74055**

**Case No:**  
**CJ-2017-7301**

Plaintiff(s) JEREMY ROWAN AND MELINDA ROWAN,

Defendant(s) STATE FARM FIRE &amp; CASUALTY COMPANY, AND BRODOC LLC DBA SERVPRO OF EDMOND

Invoice Date: 3/15/2021		Invoice No: 143363		Terms: Payable Upon Receipt	
Quantity	Description	Rate	Amount		
1	SERVICE FEE, JEFFREY MARK WESLEY, OWASSO, OK	\$69.00	\$69.00		
1	ADVANCED WITNESS FEE	\$10.00	\$10.00		
1	EXPEDITED SERVICE	\$69.00	\$69.00		
			SUBTOTAL	\$148.00	
			PRE PAID		
			<b>TOTAL DUE</b>	<b>\$148.00</b>	

**Bryan Smith & Associates, Inc.**  
**Federal Tax ID # 73-1426539**

**PLEASE INDICATE INVOICE NUMBERS ON YOUR CHECK TO INSURE PROPER POSTING OF PAYMENT**

CREDIT CARDS ACCEPTED

THANK YOU FOR YOUR BUSINESS

# **JIM GENDILL, PE**

**FORENSIC STRUCTURAL ENGINEERING  
AND DRAINAGE ASSESSMENTS**

**2520 Valley View Rd. Edmond, OK 73034**

**(405) 590-1894**

## **INVOICE**

**DATE:** January 11, 2022

**CLIENT:** Whitten Burrage Law  
Atten: Revell Parrish

**RE:** Deposition Fee

**SUBJECT PROPERTY:** 18253 N. 2860 Rd.  
Kingfisher, OK

**DATE OF SERVICE:** 1/11/2022

<b>ENGINEERING FEE (@ \$185.00/hr)</b>	<b>\$277.50</b>
<b>Travel (milage @ \$1.00/mi)</b>	<b><u>\$ 40.00</u></b>
<b>AMOUNT DUE:</b>	<b>\$317.50</b>

**MAKE PAYMENT TO: JIM GENDILL**

## WHITTEN &amp; BURRAGE, LLP OPERATING ACCOUNT

65C

DATE	DESCRIPTION	INVOICE #	AMOUNT	CHECK DEDUCTION	NET AMOUNT
08/19/2022	Canadian County Sheriff Rowan v. State Farm - Service fee	SERVICE	50.00		50.00

CHECK DATE	CONTROL NUMBER	TOTALS ▶	Gross:	Ded:	Net:
08/19/2022	6504		50.00	0.00	50.00

WHITTEN & BURRAGE, LLP  
OPERATING ACCOUNT  
512 N BROADWAY AVE SUITE 300  
OKLAHOMA CITY, OK 73102  
PH: 405-516-7800

FIRST UNITED BANK AND TRUST COMPANY  
80-88/1031

65C

DATE 08/19/2022 CHECK AMOUNT  
\*\*\*\*\*\$50.00

\*\*\* FIFTY &amp; 00/100 DOLLARS

## PAY

TO THE  
ORDER Canadian County Sheriff  
OF:

MEMO: Rowan v. State Farm

AUTHORIZED SIGNATURE

WHITTEI

22-01748 07-2017-7301 Rowan v State Farm Fire & Acc.	<b>RECEIPT</b>		Date <u>8/19/2022</u>	No. <u>188492</u>
	Received From <u>Whitten + Burrage LLP</u>			
	Address			
	<u>Fifty dollars</u>		Dollars (\$50.00)	
	For <u>out of city sue</u>		Canadian County Sheriff's Office	
			208 West Rogers El Reno, OK 73036	
How Paid <u>CK 6504</u>		Balance Due -	By <u>Shirley Wolf</u>	

8/26/22, 7:44 PM

canadianso/CivilProcessDetailPrint.aspx?PartySelected=0,41500&amp;CivilID=22886

<b>Canadian County Sheriffs Office</b> 204 W Rogers El Reno, OK 73036 (405) 422-3187	<h2>Civil Process</h2>	Case Number 22-01748
		Date Filed 08/19/2022 15:14

Issued Agency	Canadian County Sheriffs Office	Date Filed	08/19/2022 15:14
Civil / Job Number	22-01748	Court / Hearing Date	08/29/2022 09:00
Docket Number	CJ-2017-7301 Sequence No 1	Date Received	08/19/2022 15:14
Court	Oklahoma County	Receiver Type	Witness
Court Type	District	Expiration Date	
Process Type	Subpoena	Reissued ?	No
Assigned /Served To		Receipt No	188492
Invoice Date		Amount	\$50.00
Payment Type			
Payment Notes	ck 6504		
Comments			
Notes			

Name	Type	Service	Served Date	Served Location
LEATHERS, MARK RAY	Witness	Not Found	08/24/2022 16:00	

**Witness** LEATHERS, MARK RAY  
**Address** 14900 NW 10TH, YUKON, OK 73099  
**Manner of Service** Not Found  
**Manner of Service / Sub** Residential  
**Final Executed Date** 08/24/2022 16:00  
**Served Date** 08/24/2022 16:00  
**Served By** KENDRICK, RENEE  
**Location Served**  
**Served To**  
**Person Acting Served**

**Transport Order Date**  
**Transport Date**  
**Transport From**  
**Transport To**  
**Service Fee** 50.00  
**Mileage Fee** 0.00  
**Other Fee** 0.00

**Return To** Oklahoma County Court Clerk  
**Return Date** 08/26/2022 00:00  
**Return Notes** Mark Leathers is avoiding service. He reportedly ran a private process server off the road. On two separate occasions he saw me pull up, went inside his garage, and closed the door. His company abruptly left in their vehicle and offered no assistance.

**Attempted Served**

Attempted # 1	Attempted By Officer
Attempted Note	
Attempted # 2	Attempted By Officer
Attempted Note	
Attempted # 3	Attempted By Officer
Attempted Note	

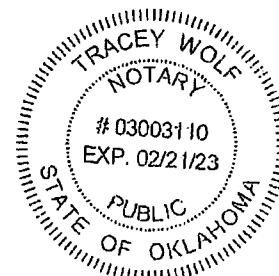
Officer Name

R. KENDRICK

Officer Signature

[Signature]Date 08/26/2022

Subscribed and Sworn to before me

this 26<sup>th</sup> day of August 2022
Tracey Wolf  
 Notary Public




**THANK YOU FOR YOUR BUSINESS!**

Whitten & Burrage, LLP  
512 N. Broadway Avenue, Suite 300  
Oklahoma City, OK 73102  
(405) 516-7800

Tax ID #26-1468767

Jeremy & Melinda Rowan

Page: 1  
10/25/2022  
Account No: 514-0001  
Statement No: 3

Rowan, Jeremy & Melinda v. State Farm F&C Co.

Interim Statement

Expenses

08/18/2022	Witness & mileage fee paid to Jeffrey Mark Wesley (3092)	166.25
08/22/2022	Witness & mileage fee paid to Jack Buben (3093)	35.00
08/22/2022	Witness & mileage fee paid to Jason Taylor (3094)	41.25



Legal Graphics, Inc.  
228 Robert S. Kerr, Suite 300  
Oklahoma City, OK 73102

# ***Invoice***

Date: **9/1/2022**

Invoice No: **10384**

Federal Tax ID: 73-1353638

Whitten Burrage  
512 N. Broadway, Suite 300  
Oklahoma City, OK 73102  
Attn: Barbara Urtz

Re: **Rowen v. State Farm**

Work performed Aug 25 - 26, 2022  
(detail attached)

0.75	SA - Hours @ \$150/hr.	112.50
2	BR - Hours @ \$125/hr.	250.00
	Reproduction Costs	1,585.00T
	Material Costs	440.00T
	Sales Tax	174.66

**Total Bill \$2,562.16**

LG Phone:

(405) 232-5242

All Invoices are due upon receipt. Interest at the rate of 1½% per month will be charged on invoices not paid within 30 days.

# Legility

## Invoice

Page 1 of 1

Date	8/19/2022
Invoice	INV00178092
Job #	0822065
Terms	Net 10
Due Date	8/29/2022
Sales Rep	Williams, Clint

Inventus US

<b>Ordered By:</b> Barbara
<b>Client Matter:</b> Rowan/State Farm-514.1
<b>Project:</b> -
Whitten Burrage 512 N Broadway Ave Ste 300 Oklahoma City OK 73102-6235

Item	Description	Qty	UOM	Rate	Tax	Amount
5030	Blowbacks Color	1,200	PG	\$1.25	Y	\$1,500.00
Subtotal						\$1,500.00
Tax						\$129.38
Total						\$1,629.38
Payments / Credits						\$0.00
Balance Due						\$1,629.38

Wire Information		ACH Information		REMIT TO:
<b>Bank Name:</b>	Citizens Commercial Banking	<b>Bank Name:</b>	Citizens Commercial Banking	Inventus, LLC
<b>Bank Address:</b>	1 Citizens Drive Riverside, RI 02915	<b>Bank Address:</b>	1 Citizens Drive Riverside, RI 02915	P.O. Box 654368 Dallas, TX 75265-4368
<b>Routing Number:</b>	011500120	<b>Routing Number:</b>	211070175	Federal Tax ID# 26-1648414
<b>Account Number:</b>	1401319529	<b>Account Number:</b>	1401319529	
<b>Account Name:</b>	Inventus, LLC	<b>Account Name:</b>	Inventus, LLC	
<b>SWIFT/BIC Code:</b>	CTZIUS33			

If you have questions regarding this invoice, please contact your Sales Rep/Project Manager or email [BillingDS@legility.com](mailto:BillingDS@legility.com).

Legility LLC | 216 Centerview Drive Suite 250 | Brentwood, TN 37027 | 888-534-4548



# Invoice

Page 1 of 1

Date	8/25/2022
Invoice	INV00178241
Job #	0822095
Terms	Net 10
Due Date	9/4/2022
Sales Rep	Williams, Clint

Inventus US

<b>Ordered By:</b> Barbara
<b>Client Matter:</b> Rowan vs. State Farm
<b>Project:</b> -
Whitten Burrage 512 N Broadway Ave Ste 300 Oklahoma City OK 73102-6235

Item	Description	Qty	UOM	Rate	Tax	Amount
5025	Blowbacks B/W	4,476	PG	\$0.185	Y	\$828.06
5030	Blowbacks Color	1,196	PG	\$1.25	Y	\$1,495.00
1060	Preprinted Tabs	104	EACH	\$0.35	Y	\$36.40
Subtotal						\$2,359.46
Tax						\$203.51
Total						\$2,562.97
Payments / Credits						\$0.00
Balance Due						\$2,562.97

Wire Information		ACH Information		REMIT TO:
<b>Bank Name:</b>	Citizens Commercial Banking	<b>Bank Name:</b>	Citizens Commercial Banking	Inventus, LLC
<b>Bank Address:</b>	1 Citizens Drive Riverside, RI 02915	<b>Bank Address:</b>	1 Citizens Drive Riverside, RI 02915	P.O. Box 654368 Dallas, TX 75265-4368
<b>Routing Number:</b>	011500120	<b>Routing Number:</b>	211070175	Federal Tax ID# 26-1648414
<b>Account Number:</b>	1401319529	<b>Account Number:</b>	1401319529	
<b>Account Name:</b>	Inventus, LLC	<b>Account Name:</b>	Inventus, LLC	
<b>SWIFT/BIC Code:</b>	CTZIUS33			

If you have questions regarding this invoice, please contact your Sales Rep/Project Manager or email [BillingDS@legility.com](mailto:BillingDS@legility.com).

Legility LLC | 216 Centervlew Drive Suite 250 | Brentwood, TN 37027 | 888-534-4548



**MARILYN S. HODGEN, CSR, RMR**

***Official Court Reporter***

***Oklahoma County Courthouse  
321 Park Avenue, Room 325  
Oklahoma City, OK 73102  
marilyn.hodgen@oscn.net  
(405) 713-1402***

**INVOICE**

March 8, 2022

Whitten Burrage  
Attn: Revell Parrish  
512 N. Broadway Avenue, Suite 300  
Oklahoma City, OK 73102

IN RE: Jeremy Rowan, et al., vs. State Farm, et al., Case No. CJ-2017-7301

\*\*\*\*\*

Copy of Transcript of Defendant State Farm's Notice of Deposition and  
Motion for Protective Order, January 25, 2022  
22 pages @ \$ 1.75 per page

**\$ 38.50**

\*\*\*\*\*

Thank you,

Marilyn S. Hodgen, CSR, RMR



SCOTT WILMETH, CSR, RPR  
Official Court Reporter  
321 Park Avenue, Suite 359  
Oklahoma City, OK 73102  
(405) 713-1120  
scottwilmeth@cox.net

INVOICE DATE: August 22, 2022

TO: MR. J. REVELL PARRISH  
Whitten, Burrage  
512 N. Broadway Avenue, Suite 300  
Oklahoma City, OK 73102  
(405) 516-7800  
[rparrish@whittenburrage.com](mailto:rparrish@whittenburrage.com)

---

For Copy of Transcript of Proceedings of Cross Motions in Limine, Defendant's Motion to  
Exclude and Motion to Reconsider or Vacate  
Rowan vs. State Farm  
Case Number CJ-2017-7301  
Heard August 18, 2022  
Before the Honorable Don Andrews

Cost of Copy of Transcript..... \$ 124.25

---

THANK YOU!

SCOTT WILMETH, CSR, RPR  
Official Court Reporter  
321 Park Avenue, Suite 359  
Oklahoma City, OK 73102  
(405) 713-1120  
scottwilmeth@cox.net

STATEMENT DATE: September 1, 2022

TO: MR. J. REVELL PARRISH  
Whitten, Burrage  
512 N. Broadway Avenue, Suite 300  
Oklahoma City, OK 73102  
(405) 516-7800  
[rparrish@whittenburragelaw.com](mailto:rparrish@whittenburragelaw.com)

---

For Expedited Transcript of Proceedings of Requested Excerpts Taken from Jury Trial - Opening  
Statements, Testimony of Jack Buben - and Copy of Testimony of Diane Luther  
Rowan vs State Farm, et al  
Case Number CJ-2017-7301  
Heard August 29, 30 & 31, 2022  
Before the Honorable Don Andrews

Cost of Transcript..... \$ 1,778.75

---

THANK YOU!

SCOTT WILMETH, CSR, RPR  
Official Court Reporter  
321 Park Avenue, Suite 359  
Oklahoma City, OK 73102  
(405) 713-1120  
scottwilmeth@cox.net

STATEMENT DATE: October 4, 2022

TO: MR. J. REVELL PARRISH  
Whitten, Burrage  
512 N. Broadway Avenue, Suite 300  
Oklahoma City, OK 73102  
(405) 516-7800  
[rparrish@whittenburragelaw.com](mailto:rparrish@whittenburragelaw.com)

---

For Transcript of Proceedings of Jury Trial  
Rowan vs State Farm, et al  
Case Number CJ-2017-7301  
Heard August 29, 30 & 31, 2022  
Before the Honorable Don Andrews  
(Cost of previously transcribed proceedings has been deducted)

Cost of Transcript..... \$ 2,408.00

---

THANK YOU!



Reggie N. Whitten  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
174942	12/8/2020	148073
Job Date	Case No.	
12/2/2020	CJ-2017-7301	
Case Name		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
Payment Terms		
Net 30 days		

ORIGINAL AND 2 CERTIFIED COPIES OF TRANSCRIPT OF:

Mark Leathers

1,294.97

**TOTAL DUE >>>**

**\$1,294.97**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF AN ORIGINAL AND TWO COPIES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*



Reggie N. Whitten  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
174853	12/8/2020	148073
Job Date	Case No.	
12/2/2020	CJ-2017-7301	
Case Name		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
Payment Terms		
Net 30 days		

---

Mark Leathers

652.50

**TOTAL DUE >>>****\$652.50**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF VIDEO SERVICES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

---

**Tax ID:** 45-3953521

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Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

<b>Invoice No.</b>	<b>Invoice Date</b>	<b>Job No.</b>
175108	12/15/2020	148074
<b>Job Date</b>	<b>Case No.</b>	
12/9/2020	CJ-2017-7301	
<b>Case Name</b>		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
<b>Payment Terms</b>		
Net 30 days		

ORIGINAL AND 2 CERTIFIED COPIES OF TRANSCRIPT OF:  
Jack Buben

1,249.80  
**TOTAL DUE >>> \$1,249.80**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF AN ORIGINAL AND TWO COPIES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

Job No. : 148074 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 175108 Invoice Date : 12/15/2020  
**Total Due : \$1,249.80**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

## PAYMENT WITH CREDIT CARD



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:



Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
174990	12/15/2020	148074
Job Date	Case No.	
12/9/2020	CJ-2017-7301	
Case Name		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
Payment Terms		
Net 30 days		

Jack Buben

652.50

**TOTAL DUE >>>****\$652.50**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF VIDEO SERVICES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

Job No. : 148074 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 174990 Invoice Date : 12/15/2020  
**Total Due : \$652.50**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

## PAYMENT WITH CREDIT CARD



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:





Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
177510	4/5/2021	150069
Job Date	Case No.	
3/26/2021	CJ-2017-7301	
Case Name		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
Payment Terms		
Net 30 days		

ORIGINAL AND 2 CERTIFIED COPIES OF TRANSCRIPT OF:  
Jeffrey Mark Wesley

760.37  
**TOTAL DUE >>> \$760.37**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF AN ORIGINAL AND TWO COPIES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

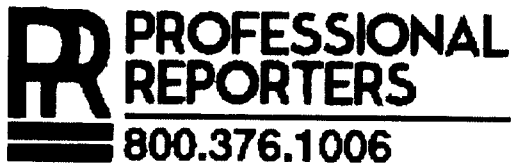
Job No. : 150069 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 177510 Invoice Date : 4/5/2021  
**Total Due : \$760.37**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

## PAYMENT WITH CREDIT CARD



Cardholder's Name: \_\_\_\_\_  
Card Number: \_\_\_\_\_  
Exp. Date: \_\_\_\_\_ Phone#: \_\_\_\_\_  
Billing Address: \_\_\_\_\_  
Zip: \_\_\_\_\_ Card Security Code: \_\_\_\_\_  
Amount to Charge: \_\_\_\_\_  
Cardholder's Signature: \_\_\_\_\_  
Email: \_\_\_\_\_



Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
177388	4/5/2021	150069
Job Date	Case No.	
3/26/2021	CJ-2017-7301	
Case Name		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
Payment Terms		
Net 30 days		

Jeffrey Mark Wesley\*

465.00

**TOTAL DUE >>>**

**\$465.00**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF VIDEO SERVICES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

Job No. : 150069 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 177388 Invoice Date : 4/5/2021  
**Total Due : \$465.00**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

**PAYMENT WITH CREDIT CARD**



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:



Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

<b>Invoice No.</b>	<b>Invoice Date</b>	<b>Job No.</b>
187360	6/13/2022	156534
<b>Job Date</b>	<b>Case No.</b>	
6/2/2022	CJ-2017-7301	
<b>Case Name</b>		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
<b>Payment Terms</b>		
Net 30 days		

ORIGINAL AND 2 CERTIFIED COPIES OF TRANSCRIPT OF:  
Jason Taylor

1,221.39  
**TOTAL DUE >>> \$1,221.39**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF AN ORIGINAL AND TWO COPIES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

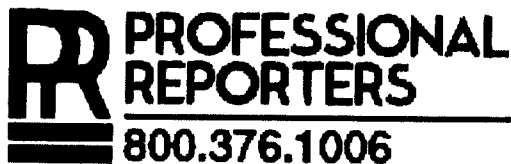
Job No. : 156534 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 187360 Invoice Date : 6/13/2022  
**Total Due : \$1,221.39**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

## PAYMENT WITH CREDIT CARD



Cardholder's Name: \_\_\_\_\_  
Card Number: \_\_\_\_\_  
Exp. Date: \_\_\_\_\_ Phone#: \_\_\_\_\_  
Billing Address: \_\_\_\_\_  
Zip: \_\_\_\_\_ Card Security Code: \_\_\_\_\_  
Amount to Charge: \_\_\_\_\_  
Cardholder's Signature: \_\_\_\_\_  
Email: \_\_\_\_\_



Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

<b>Invoice No.</b>	<b>Invoice Date</b>	<b>Job No.</b>
187187	6/13/2022	156534
<b>Job Date</b>	<b>Case No.</b>	
6/2/2022	CJ-2017-7301	
<b>Case Name</b>		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
<b>Payment Terms</b>		
Net 30 days		

Jason Taylor

745.00

**TOTAL DUE >>>****\$745.00**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF VIDEO SERVICES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

Job No. : 156534 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 187187 Invoice Date : 6/13/2022  
**Total Due : \$745.00**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

## PAYMENT WITH CREDIT CARD



Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

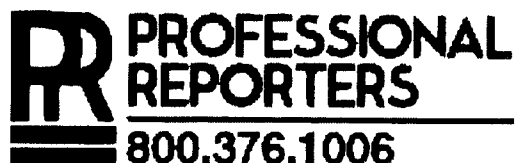
Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:



Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
189175	8/24/2022	158489
Job Date	Case No.	
8/19/2022	CJ-2017-7301	
Case Name		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
Payment Terms		
Net 30 days		

ORIGINAL AND 2 CERTIFIED COPIES OF TRANSCRIPT OF:  
Johnny Phanthala

805.96  
**TOTAL DUE >>> \$805.96**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF AN ORIGINAL AND TWO COPIES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

Job No. : 158489 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 189175 Invoice Date : 8/24/2022  
**Total Due : \$805.96**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

## PAYMENT WITH CREDIT CARD



Cardholder's Name: \_\_\_\_\_

Card Number: \_\_\_\_\_

Exp. Date: \_\_\_\_\_

Phone#: \_\_\_\_\_

Billing Address: \_\_\_\_\_

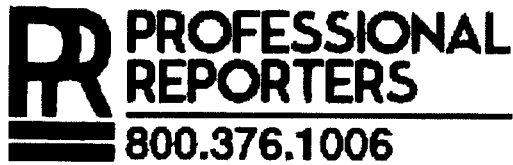
Zip: \_\_\_\_\_

Card Security Code: \_\_\_\_\_

Amount to Charge: \_\_\_\_\_

Cardholder's Signature: \_\_\_\_\_

Email: \_\_\_\_\_



Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

# INVOICE

1 of 1

Invoice No.	Invoice Date	Job No.
189095	8/24/2022	158489
Job Date	Case No.	
8/19/2022	CJ-2017-7301	
Case Name		
Rowan vs. State Farm & Brodoc / Servpro of Edmond		
Payment Terms		
Net 30 days		

Johnny Phanthala

581.25

**TOTAL DUE >>>****\$581.25**

PLEASE NOTE: THE ABOVE AMOUNT REFLECTS THE COST OF VIDEO SERVICES.

Any questions about billing should be raised within 15 days of receipt of invoice otherwise the billing will be deemed accepted as presented.

We appreciate your business.

**Tax ID:** 45-3953521

*Please detach bottom portion and return with payment.*

Revell Parrish  
Whitten Burrage  
512 N. Broadway  
Suite 300  
Oklahoma City, OK 73102

Job No. : 158489 BU ID : 1-Oklahoma  
Case No. : CJ-2017-7301  
Case Name : Rowan vs. State Farm & Brodoc / Servpro of Edmond  
Invoice No. : 189095 Invoice Date : 8/24/2022  
**Total Due : \$581.25**

Remit To: **Professional Reporters**  
**511 Couch Drive**  
**Suite 100**  
**Oklahoma City, OK 73102**

## PAYMENT WITH CREDIT CARD



Cardholder's Name: \_\_\_\_\_  
Card Number: \_\_\_\_\_  
Exp. Date: \_\_\_\_\_ Phone#: \_\_\_\_\_  
Billing Address: \_\_\_\_\_  
Zip: \_\_\_\_\_ Card Security Code: \_\_\_\_\_  
Amount to Charge: \_\_\_\_\_  
Cardholder's Signature: \_\_\_\_\_  
Email: \_\_\_\_\_





**IN THE DISTRICT COURT OF OKLAHOMA COUNTY,  
STATE OF OKLAHOMA**

**JEREMY ROWAN AND MELINDA  
ROWAN, Husband and Wife,**

**Plaintiffs,**

**v.**

**STATE FARM FIRE & CASUALTY  
COMPANY,**

**Defendant.**

**Case No. CJ-2017-7301  
Honorable Don Andrews**

**AFFIDAVIT OF JOE E. WHITE, JR.**

Joe E. White, Jr., of lawful age, having personal knowledge of the matters discussed herein and being first duly sworn, hereby deposes and states:

1. I have been asked to examine the detailed time records of Whitten Burrage, an Oklahoma City law firm ("the Firm"), for work performed on behalf of Plaintiffs, Jeremy Rowan and Melinda Rowan, husband and wife, in Case No. CJ-2017-7301 in the District Court of Oklahoma County (the "Litigation"), and to address the reasonable value for the services performed by the Firm in the Litigation based on the standards within the Oklahoma County legal community.<sup>1</sup> See *State ex rel. Burk v. City of Oklahoma City*, 598 P.2d 659 (Okla. 1979).

2. I have been a practicing attorney and member of the Oklahoma Bar Association since October 5, 1988, and have been a member of the Oklahoma County Bar Association since 1988. I have prosecuted civil actions in state and federal district courts throughout Oklahoma for 34 years. My practice throughout that time has included the defense and prosecution of litigation arising from torts and breaches of contract, insurance disputes, and a variety of other civil matters including insurance bad faith claims. Since 1988, I have practiced law throughout the State of Oklahoma, and I am knowledgeable of the standards within the legal community regarding costs and hourly rates.

3. I have reviewed the pleadings filed in the Litigation, depositions and the Firm's detailed time records and cost statement.

4. The Litigation arises from the bad faith claim handling and denial of Plaintiffs' insurance claim for storm damages which inflicted significant damage to their home April 29, 2017. The

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<sup>1</sup> The opposing attorneys and respective firms are both located in the Oklahoma City area (Lance Leffel, Jay Walters, John Krattiger and Ashlyn Smith of Gable Gotwals are located in Oklahoma City.)

**EXHIBIT**

**4**

exhibitstick.com

Whitten Burrage Law Firm represented Plaintiffs Jeremy Rowan and Melinda Rowan, husband and wife, in the Litigation.

5. The Litigation progressed from suit filing on December 28, 2017 through the present time, for nearly five years, and included four (4) days of trial. On that date, September 1, 2022, the jury unanimously awarded Plaintiffs \$70,400.00 for their breach of contract claim and \$680,000.00 for their bad faith claim, resulting in a total verdict of \$750,400.00. Plaintiffs are entitled to attorney fees and interest under 36 O.S. §3629(B) and costs pursuant 12 O.S. §942.

6. The Whitten Burrage Firm expended significant time, resources, and expenses in successfully prosecuting this case. Depositions were taken by both parties, with appropriate preparation and attendance. In addition, significant written discovery occurred including the production and review of literally 90,000+ documents related to Plaintiffs' lawsuit. Various motions were filed by Defendant necessitating appropriate responses by Plaintiffs' counsel and subsequent oral argument in Oklahoma County before the Honorable Judge Don Andrews. Further, adding complexity and delay to this case, Defendant removed the lawsuit from Oklahoma County to the United States District Court for the Western District of Oklahoma on two separate occasions. This necessitated further briefing and argument by Plaintiffs' counsel to have the case remanded back to Oklahoma County. In short, in my opinion, this case presented significant legal hurdles and obstacles that created unnecessary delay and expense in getting this matter timely tried to a jury. This case further required extensive legal research and motion practice.

7. It should also be noted that the Defendant in this Litigation was represented by Lance Leffel, Jay Walters, John Krattiger and Ashlyn Smith of Gable Gotwals. Based upon my review of the pleadings filed in this case, along with the deposition testimony, and most importantly, my professional familiarity with Mr. Leffel and Mr. Walters, State Farm's counsel are highly skilled in the profession of defending insurance bad faith litigation.<sup>2</sup>

8. I am familiar with the Plaintiffs' attorneys and the Whitten Burrage Firm who primarily worked and tried this case, as I have personally worked with Revell Parrish, Reggie Whitten and Michael Burrage. I am also familiar with the paralegal work of Barbara Urtz. Each of these lawyers are excellent attorneys in prosecuting many types of cases including insurance bad faith cases. I have worked with Revell Parrish on an insurance bad faith case resulting in a large global settlement. Mr. Parrish's reputation as a litigator and practicing attorney in the State of Oklahoma is that of a well-respected lawyer. He is many years wise beyond his approximate 12 years as a lawyer. Revell's experience in prosecuting complex civil cases is noteworthy given

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<sup>2</sup> I am familiar with lawyers, Krattiger and Smith by reputation only. Each of their reputations exemplify the excellent standards of practice associated with the law firm Gable Gotwals.

the results he obtains for client(s). Reggie Whitten's and Mike Burrage's reputations as litigators are simply outstanding. Finally, I am personally familiar with the quality of work of Barbara Urtz and she too represents the greatness that Whitten Burrage is known for in what it achieves by way of settlement or otherwise for its clients.

9. The Whitten Burrage Firm has submitted itemized and detailed time records of its work in prosecuting Plaintiffs' claim(s). In my opinion, based upon my knowledge and familiarity with the facts in this case, the lawyers who prosecuted this case, the unique and complex legal issues and hurdles presented by the Defendant based upon the affidavits, and detailed time records of the Whitten Burrage Firm, in my opinion, the rates charged and time expended are reasonable given the facts and circumstances of Plaintiffs' case. Along that line, the total number of hours submitted by Revell Parrish are consistent with what I know to be the typical number of hours associated with the lead trial attorney prosecuting a complex homeowners insurance bad faith claim.

10. The Whitten Burrage Firm performed a total of 1,928.40 hours of work to prosecute and try this litigation. The hours expended by Plaintiffs' counsel were reasonable as it relates to investigating Plaintiffs' insurance claim, developing the factual record, engaging in hard-fought discovery, briefing legal issues, getting the case remanded back to state court (twice), and adequately preparing for trial including the preparation of witness, exhibits, and demonstrative materials. All of the work performed by the Whitten Burrage Firm was reasonable and necessary to obtain the successful result ultimately accomplished. The time and labor required was necessary given the aggressive defense presented by Defendant's counsel. The work performed was extraordinary by Plaintiffs' counsel for this type of suit -- a property damage claim. This was a complex matter involving an Offer to Confess Judgment by the Defendant of \$400,000.00 prior to trial. Plaintiffs and their counsel beat that offer. It is obvious that the Whitten Burrage attorneys and paralegals possess the skill and experience necessary to perform the work efficiently and properly as evidenced by the jury verdict obtained.

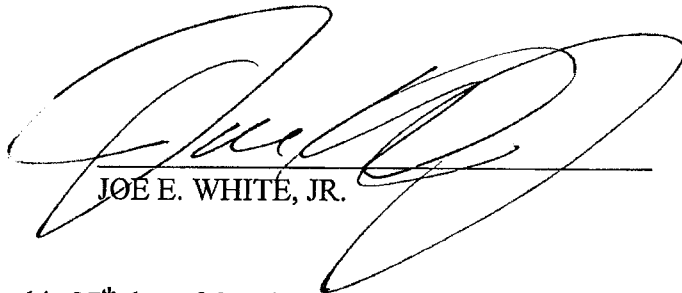
11. The hourly rates per hour for Revell Parrish (\$275.00), Reggie Whitten (\$750.00), Michael Burrage (\$750.00), Liz Davies (\$275.00), Jesse Ogle (\$225.00), Barbara Urtz (\$150.00) and Vicki Trammell (\$150.00) are reasonable and customary in the Oklahoma City legal community and in Oklahoma County, given the complexity of this Litigation and the fact that Defendant was presented by Oklahoma City area, highly-skilled defense lawyers. The rate charged by Revell Parrish is likewise reasonable and customary, although in this particular litigation involving complex property damage issues, Mr. Parrish easily justifies at \$350.00 an hour in my opinion. However, I know that his rate **at that time** (2019) of \$275.00 per hour should not be questioned today nor was it questioned at the time Judge Wyrick entered his Remand Order and awarded attorney fees against State Farm.

12. The hourly rate incurred by the Whitten Burrage Firm (or lodestar amount of \$512,247.50) does not fully compensate and reflect the work performed and the result obtained. Therefore, pursuant to *State ex rel. Burk v. City of Oklahoma City*, 598 P.2d 659, 661 (Okla.

1979), it is my opinion the Court should enhance this amount. As set forth above, the length of this case, the discovery that was conducted, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly were all present in this case and favor an enhancement of the lodestar fee. Additionally, Plaintiffs' counsel incurred \$21,158.39 in litigation expenses. In addition, counsel undoubtedly were precluded from working on other matters and took the risk of no recovery for their efforts had a defense verdict been rendered which also favors an enhancement. Further, Plaintiffs' risk was enhanced by the \$400,000 offer to confess judgment tendered by State Farm. The result obtained by Plaintiffs' counsel also favors an enhancement given the difficult issues of liability that were presented by Defendant's counsel. Competing structural engineers and standard of care in handling insurance claims experts were in play. In my opinion, this was simply **a really difficult case** for the Plaintiffs on not only the liability issues, but also the damage issues. The result obtained by Plaintiffs' counsel also favors an enhancement multiplier of at least an amount equal to the lodestar amount of \$512,247.50 for a total attorney fee of \$1,024,495.00. Such a multiplier would fully, fairly, and equitably compensate counsel and Plaintiffs herein in my opinion.

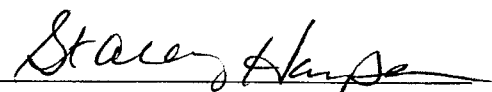
13. In addition to the attorney fees, the Whitten Burrage Firm also expended almost \$21,158.39 in litigation costs. In conformance with Oklahoma law, I understand the Whitten Burrage Firm is seeking a total of \$21,158.39 as reimbursable case expenses and costs. I have reviewed the costs for which the Firm seeks reimbursement and find the costs were reasonable and necessarily incurred for the successful prosecution of this case.

FURTHER AFFIANT SAYETH NOT.

  
JOE E. WHITE, JR.

SUBSCRIBED AND SWORN before me this 27<sup>th</sup> day of October, 2022.



  
Stacey Hampton, Notary Public

My Commission Expires: 08.07.2024

(SEAL)